UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Clear Lam Packaging, Inc.

EPA ID No.: ILD 984 805 317

LOCATION ADDRESS: 1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

NAICS CODE(S): 323112 [Commercial Flexographic Printing]

DATE OF INSPECTION: May 1, 2008

U.S. EPA INSPECTOR:
Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY: Jamie L. Paulin, Chemist — 6/6/08 Date

REVIEWED BY: Mary Setnicar, Acting Chief, Compliance Section 1, RCRA Branch — 6/6/08 Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at Clear Lam Packaging, Inc. (Clear Lam Packaging), located at 1950 Pratt Boulevard, Elk Grove Village, Illinois 60007, to examine Clear Lam Packaging's management of its RCRA regulated waste, by the U.S. Environmental Protection Agency (U.S. EPA).

Clear Lam Packaging notified U.S. EPA of its hazardous waste activities originally as a large quantity generator at or about October 15, 1990, and has one NAICS code of 323112 [Commercial Flexographic Printing]. Clear Lam Packaging employs approximately 560 people at this location.

Clear Lam Packaging mainly manufactures various types of packaging by using methods such as thermoforming, extrusion, printing and laminating. Clear Lam Packaging, at the time of this inspection, was generating solvent based hazardous waste streams including: 1) the press blend (D001) and 2) solvent contaminated rags. These hazardous waste streams contain such solvents as toluene, ethanol and propanol. One of the solvent hazardous waste streams is sent off-site for reclamation and the other solvent hazardous waste stream is sent off-site for fuels blending.

Clear Lam Packaging does not generate nor store universal waste and Clear Lam Packaging has never been inspected by U.S. EPA before.

OPENING CONFERENCE:

I arrived at Clear Lam Packaging at or around 9:30 am on May 1, 2008. I entered the building and spoke to the receptionist, explaining the purpose of my visit. She then contacted Thomas Cozza, Safety, Sanitation and Compliance Manager, to meet with me. I presented my credentials to Mr. Cozza and I explained to him why I was there and what I would need to inspect.

I conducted an opening conference in the conference room and explained to Mr. Cozza that I wanted to complete a physical inspection of the hazardous waste generation and storage areas prior to conducting the record review. I then listed, for Mr. Cozza, the various hazardous waste records that I wanted to inspect after the site inspection; stating that I wanted to review the last three years of records. Mr. Cozza immediately contacted employees to begin gathering the records.

We began the physical inspection in the hazardous waste storage area once the opening conference was complete.

SITE INSPECTION:

Mr. Cozza and James Hirst, Vice President of Manufacturing, escorted me on the physical inspection, which began in the hazardous waste storage area.

This room was considered to be a flammable materials storage room and explosion proof, containing an entrance way and a garage door. Raw materials were also being stored in this room. *See photographs 2 and 3.*

Along with the raw materials, hazardous and non-hazardous wastes were being stored in this room. Approximately fifty 55-gallon containers were being stored without any aisle space. The containers were being stored along the wall in an un-organized manner. One row of containers was being stored as a double stack. *See photographs 1 and 5 through 8.*

One 55-gallon container that was being stored in the hazardous waste storage room and among the containers of hazardous waste did not contain a label having the words, "Hazardous Waste," and did not include an accumulation date. [Clear Lam Packaging re-uses raw material containers; therefore the original product label was still located on the container.] *See photographs 9 and 10.*

In addition, several of the 55-gallon containers that were storing hazardous waste did not have the proper caps screwed into the openings of the containers. *See photographs 11, 23 and 26.*

Non-hazardous waste was also being stored in this room, along with the flammable solid hazardous waste. Various debris and equipment was located on top of several of these containers. *See photographs 12 through 14.*

Various debris and equipment was also located on top of several of the hazardous waste storage containers being stored without aisle space. *See photograph 15 and 20.*

A multitude of empty 55-gallon containers were being stored in the room because Clear Lam Packaging just had hazardous waste picked up by a transporter for removal and disposal. The transporter suctioned the solvent hazardous waste from the 55-gallon containers into a 5000 gallon tanker truck. Clear Lam Packaging then loaded an empty trailer that was being parked outside of the building with the empty containers. [Once the trailer is full of empty containers, the trailer will be removed and the containers will be re-conditioned.] The containers were considered to be RCRA empty. *See photograph 4.*

Two 55-gallon containers, being stored in this room, contained funnels screwed into the containers to make it easier for employees to pour material into the containers. However, the funnels were covered with so much ink and coatings that the funnel lids could not close. *See photographs 16, 17 and 27.*

Another 55-gallon container, being stored near the funnel lid containers, did not have a lid on the container, thus being completely opened. The employees working in the room explained to me that they were pouring extra hazardous waste that had settled at the bottom of the empty containers after suctioning from the transporter into this particular container. The employees then immediately placed a lid onto the container. *See photographs 18 and 19.*

I then asked Mr. Cozza to have the employees move the 55-gallon containers that did not have any aisle space into positions where I could see the accumulation dates of every container. These particular containers did have the words, "Hazardous Waste," located on the labels; however two of the containers did contain accumulation dates greater than 90 days. One container was dated 1/16/08, approximately 16 days greater than the 90 day storage requirement, and the other container was dated 12/20/07, approximately 40 days greater than the 90 day storage requirement. *See photographs 21, 22, 24 and 26.*

When I had completed my inspection of the hazardous waste storage area, Mr. Cozza and Mr. Hirst showed me the process lines inside of the plant. During some of the processing, containers of inks and coatings were attached to the equipment for an automatic feed into the process. *See photograph 28.*

One satellite accumulation area (SAA) container storing hazardous waste was located within the plant at a particular process area. This container was being properly stored. *See photograph 29.*

After my site inspection, we returned to the conference room where I began the record review. I returned to the hazardous waste storage room after my record review to see if aisle space had been created and the containers had been more neatly organized. The containers were separated into rows that did contain aisle space; all of the labels were facing outward and could be viewed; and the containers were placed neatly into rows of compatible waste. *See photographs 30 through 32.*

RECORD REVIEW:

Mr. Cozza and Thomas Wedoff, Vice President – Finance, aided me in my review of the hazardous waste records after we completed the physical site inspection.

The records that I inspected were records required under 35 IAC § 722 [40 CFR § 262] for large quantity generators, which included hazardous waste determination information, waste analyses, manifests, emergency procedures and training records.

My observations are categorized below.

1. Manifests

I reviewed the manifests from the hazardous waste shipments from 2005 to present. Clear Lam Packaging's manifests were being stored correctly and I did not find any deficiencies with the records at the time of the inspection.

2. Waste Analysis and Recordkeeping

I observed that Clear Lam Packaging did properly store all records of land disposal restriction (LDR) notification forms for the shipments of hazardous waste from 2005 to present.

3. Personnel Training

At the time of the inspection Mr. Cozza did supply me with various training documents showing that Clear Lam Packaging employees who are handling hazardous waste do receive OSHA's Haz Com Training, which does include most of the elements of RCRA Training. However, the training program was not labeled as RCRA Personnel Training under 40 CFR Part 265.16. The elements that the program was lacking included; 1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment, 2) response to groundwater contamination incidents and 3) shutdown of operations.

The training documentation showed that training was performed in 2007. However, Mr. Cozza could not supply me with records showing that the training had been performed in 2005 or 2006. He had not yet conducted training for 2008. Mr. Cozza explained that the file room was in disarray and that he would have to look for the records at a later date.

The job titles, job descriptions, a written description of the type and amount of both initial and continuing training, and records documenting that the training or job experience had been given to and completed by facility personnel were not included within the training documents. It appeared that the facility was not maintaining training records of former employees for at least 3 years from the last date of employment.

Lastly, it did appear that Clear Lam Packaging was training their employees within six months of employment or re-assignment via a New Employee Safety Handbook. The Handbook did include RCRA Personnel Training elements.

4. Contingency Plan

A contingency plan was available for my review during the inspection however it was called an Emergency Action Plan (EAP). The EAP did contain most of the elements of a contingency plan however elements that were not included were: 1) the plan did not describe arrangements with the hospitals and/or emergency response teams, 2) the plan did not contain the current emergency coordinator's name, office and home phone numbers and address, 3) the plan did not identify all emergency equipment including description, capability, and location, and 4) the plan had not been submitted to the police department, fire department, hospital or emergency response team.

5. Preparedness and Prevention

Based on my review of Clear Lam Packaging's records, Clear Lam Packaging had not made agreements with State emergency response teams, contractors or equipment suppliers and had not made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility.

6. Annual Reporting

Based on my review of the records, Clear Lam Packaging had filed an annual report with the Illinois Environmental Protection Agency (IEPA) by March 1 for each preceding calendar year since 2005 and the records were obtainable and complete.

CLOSING CONFERENCE:

A. I conducted the closing conference with Mr. Cozza, and provided him with the following recommendations:

1. Maintain the hazardous waste storage containers with aisle space so that the labels could be viewed.
2. Keep the hazardous waste storage containers closed and properly labeled.
3. Purchase new funnels for hazardous waste storage containers that were able to be kept closed.
4. Ensure that the hazardous waste storage containers were not being stored greater than 90 days.

B. I also provided the following explanations to Mr. Randazzo:

1. The training should be conducted annually and reflect RCRA's Personnel Training title and elements.

2. The EAP should reflect RCRA's contingency plan title and elements.

I departed Clear Lam Packaging around 1:00pm.

ATTACHMENTS: (2)

Attachment 1	Photographs taken during the time of the inspection
Attachment 2	Inspection Checklist

Attachment 1 - Photographs

Photograph 1 [P1010001 May 1, 2008] – Hazardous Waste Storage Room. Some of the 55-gallon containers were double stacked. Photograph includes non-hazardous storage as well.

Photograph 2 [P1010002 May 1, 1008] – Raw Materials were also being stored in the room where hazardous waste was being stored.

Photograph 3 [P1010003 May 1, 2008] – Raw materials were also being stored in the room where hazardous waste was being stored.

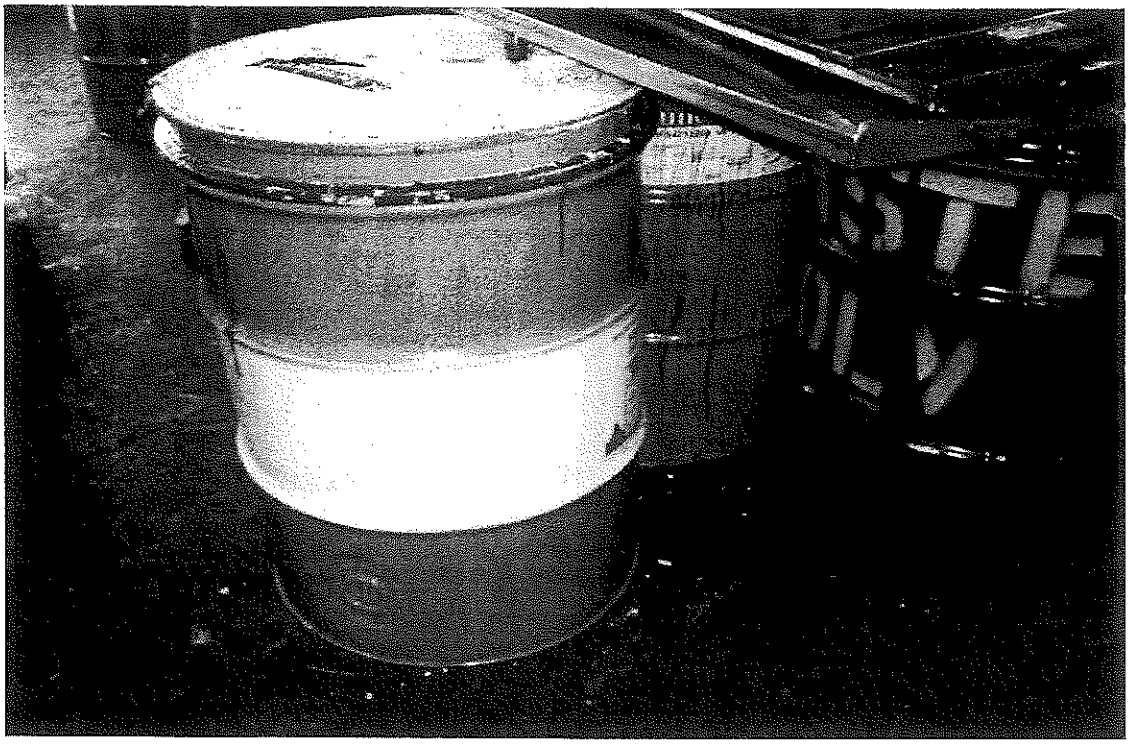
Photograph 4 [P1010004 May 1, 2008] – Trailer, storing empty 55-gallon containers, was parked outside of hazardous waste storage area. Trailer will be shipped off-site once full and the containers will be re-conditioned.

Photograph 5 [P1010005 May 1, 2008] – Hazardous Waste 55-gallon storage containers. No aisle space was present.

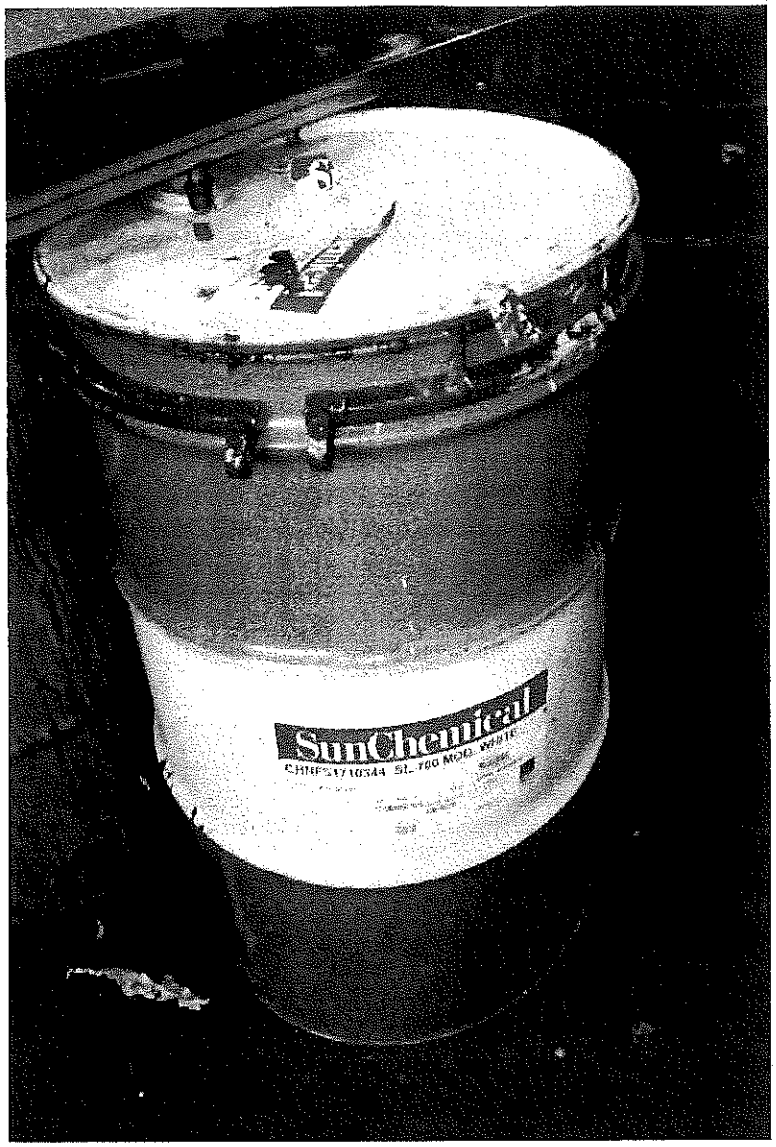
Photograph 6 [P1010006 May 1, 2008] - Hazardous Waste 55-gallon storage containers. No aisle space was present.

Photograph 7 [P1010007 May 1, 2008] - Hazardous Waste 55-gallon storage containers. No aisle space was present. Hazardous waste is suctioned out of 55-gallon containers into a tanker truck, which is shipped off-site for disposal.

Photograph 8 [P1010008 May 1, 2008] - Hazardous Waste 55-gallon storage containers. No aisle space was present.



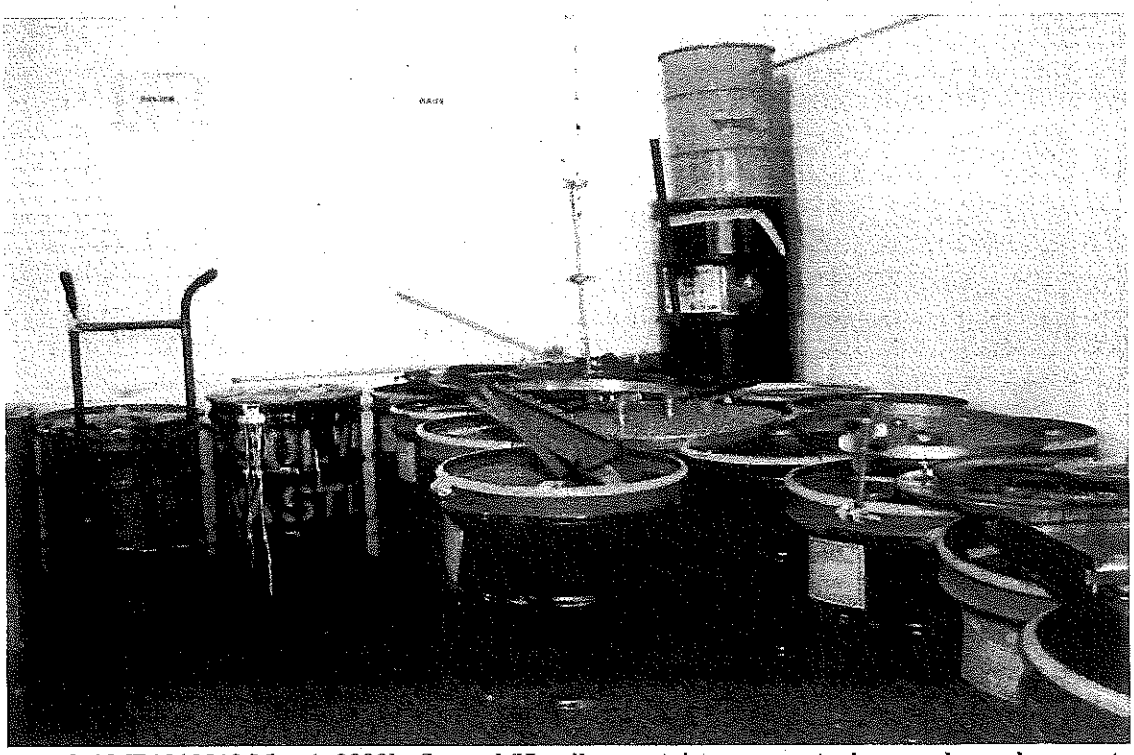
Photograph 9 [P1010009 May 1, 2008] – Un-labeled 55-gallon container was storing hazardous waste and being stored in the hazardous waste storage area.



Photograph 10 [P1010010 May 1, 2008] – Un-labeled 55-gallon container was storing hazardous waste and being stored in the hazardous waste storage area. Clear Lam Packaging re-uses raw material containers; therefore the original product label was still located on the container.

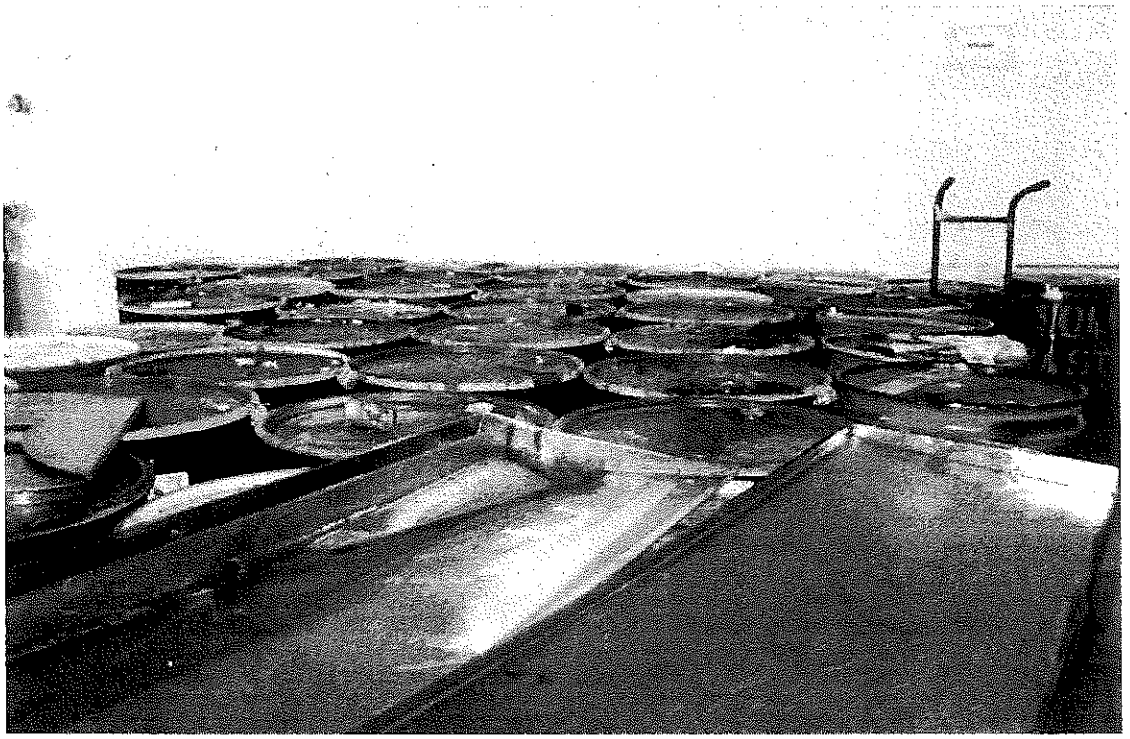
Photograph 11 [P1010011 May 1, 2008] – Several of the 55-gallon containers that were storing hazardous waste did not have proper tops screwed into the opening of the containers.

Photograph 12 [P1010012 May 1, 2008] – Several 55-gallon containers were storing non-hazardous waste and hazardous solid material. Various debris was located on top of the containers.



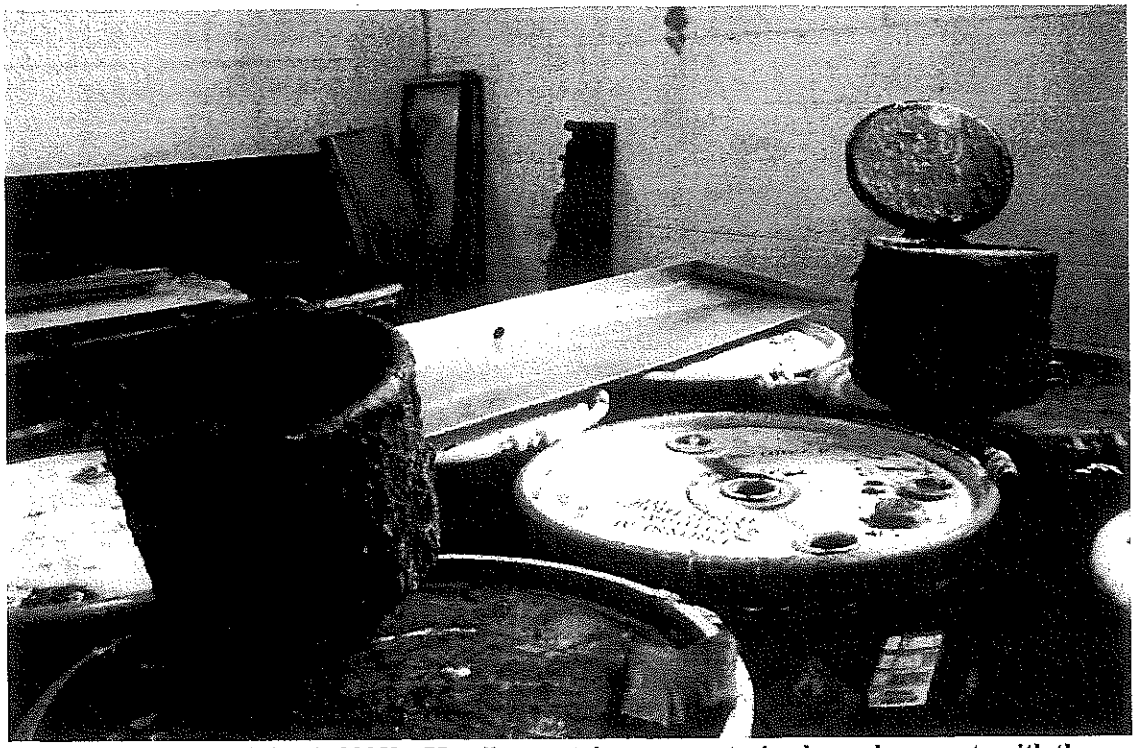
Photograph 13 [P1010013 May 1, 2008] - Several 55-gallon containers were storing non-hazardous waste and hazardous solid material. Various debris was located on top of the containers. The gray container, triple stacked, was empty.

Photograph 14 [P1010014 May 1, 2008] – Hazardous waste was being stored in the containers to the left of the aisle and non-hazardous waste was being stored in the containers to the right of the aisle, along with hazardous solid material.

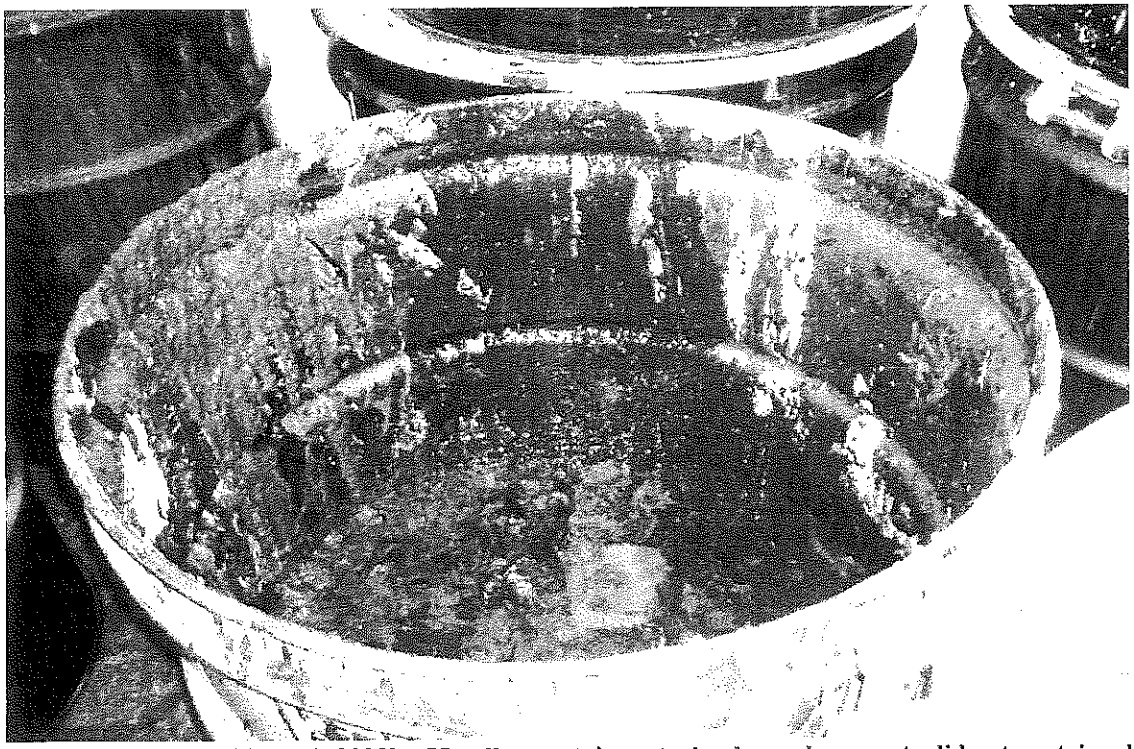


Photograph 15 [P1010015 May 1, 2008] - Hazardous Waste 55-gallon storage containers. No aisle space was present. Various debris was located on top of containers.

Photograph 16 [P1010016 May 1, 2008] – 55-gallon containers were storing hazardous waste with the attached funnels open. The ink and coating material that was covering the funnels was so thick that the funnels could not completely close.



Photograph 17 [P1010017 May 1, 2008] - 55-gallon containers were storing hazardous waste with the attached funnels open. The ink and coating material that was covering the funnels was so thick that the funnels could not completely close.



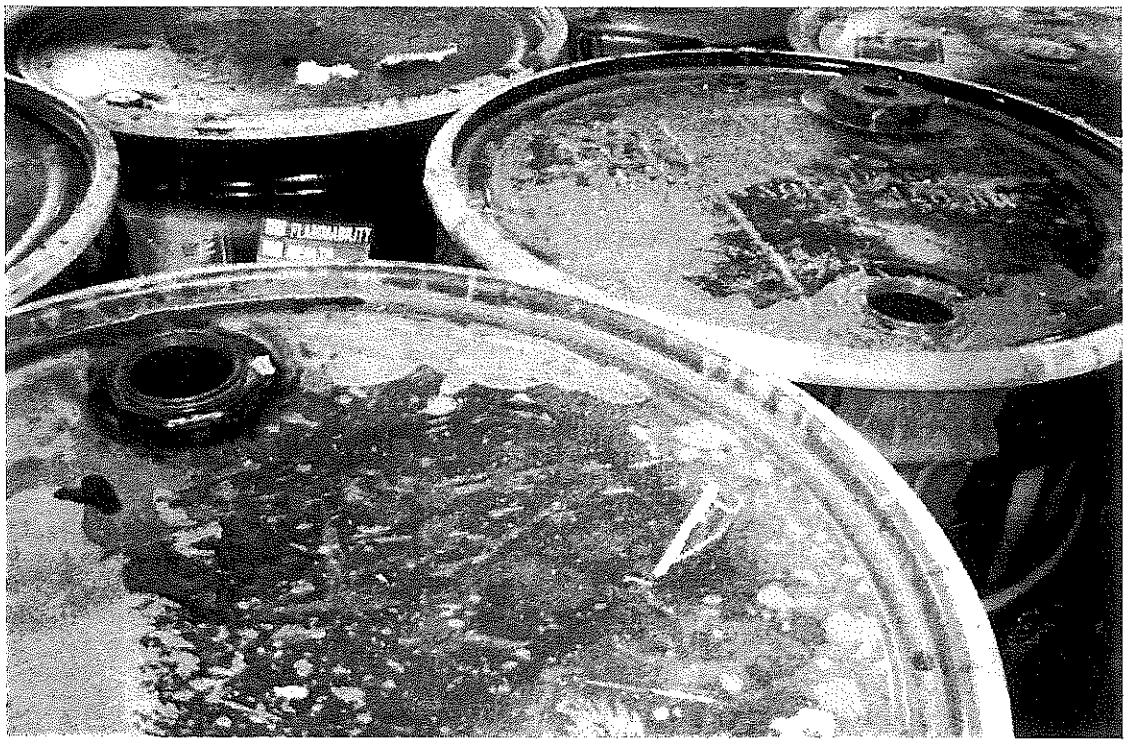
Photograph 18 [P1010018 May 1, 2008] – 55-gallon container storing hazardous waste did not contain a lid.

Photograph 19 [P1010019 May 1, 2008] - 55-gallon container storing hazardous waste did not contain a lid.

Photograph 20 [P1010020 May 1, 2008] - Hazardous Waste 55-gallon storage containers. No aisle space was present. Various debris was located on top of containers.

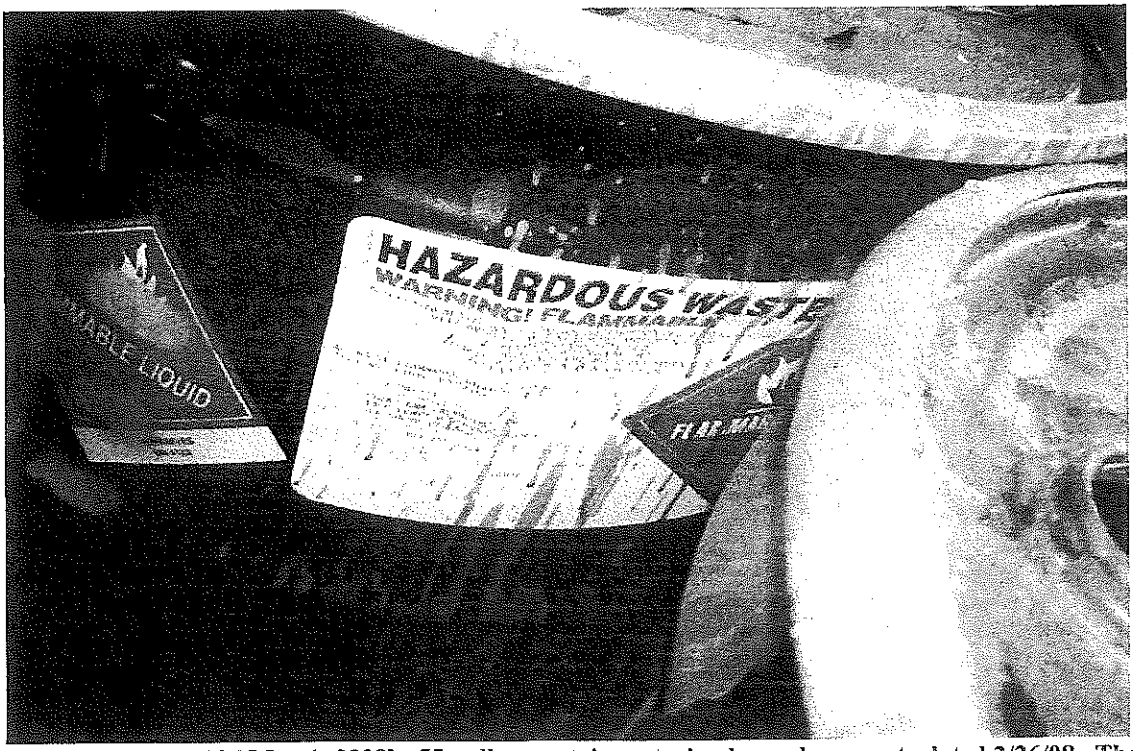
Photograph 21 [P0100021 May 1, 2008] – 55-gallon container storing hazardous waste dated 1/16/08. The container was being stored over 90 days.

Photograph 22 [P1010022 May 1, 2008] - 55-gallon container storing hazardous waste dated 1/16/08. The container was being stored over 90 days.



Photograph 23 [P1010023 May 1, 2008] - Several of the 55-gallon containers that were storing hazardous waste did not have proper tops screwed into the opening of the containers.

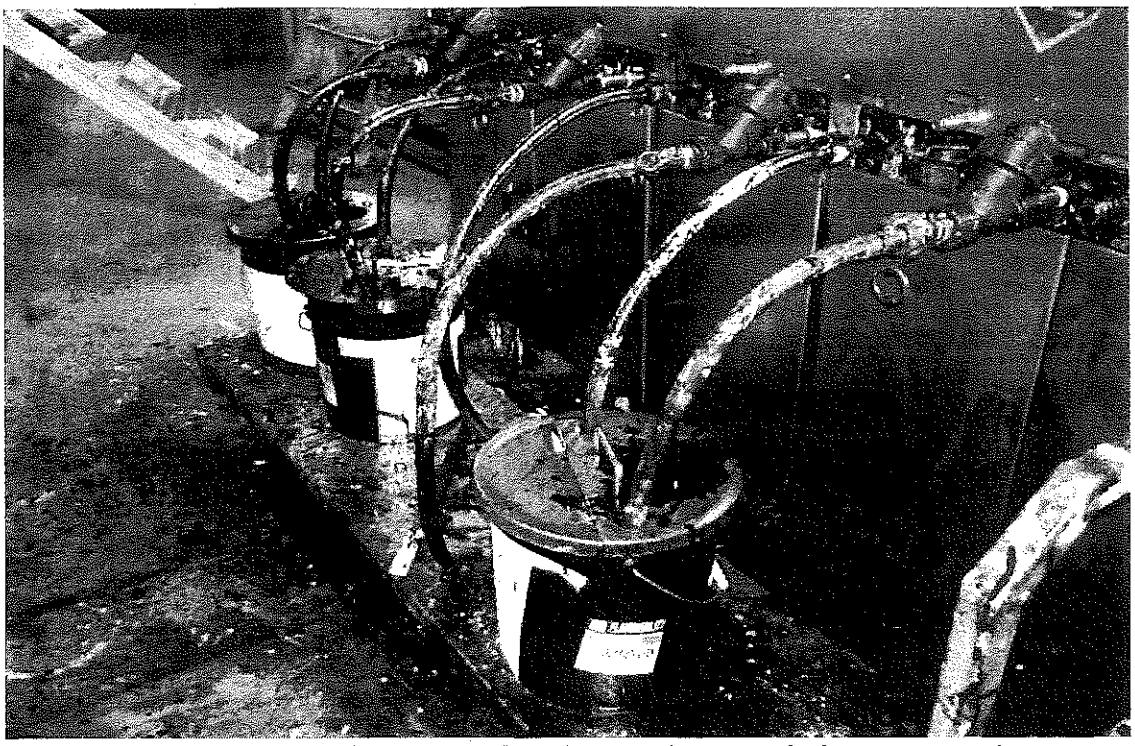
Photograph 24 [P1010024 May 1, 2008] - 55-gallon container storing hazardous waste dated 12/20/07. The container was being stored over 90 days



Photograph 25 [P1010025 May 1, 2008] - 55-gallon container storing hazardous waste dated 2/26/08. The container was close to the 90 day storage requirement.

Photograph 26 [P1010026 May 1, 2008] - Several of the 55-gallon containers that were storing hazardous waste did not have proper tops screwed into the opening of the containers.

Photograph 27 [P1010027 May 1, 2008] – 55-gallon containers were storing hazardous waste with the attached funnels open. The ink and coating material that was covering the funnels was so thick that the funnels could not completely close. Other surrounding 55-gallon containers were empty.



Photograph 28 [P1010028 May 1, 2008] – Ink and coating containers attached to process equipment.

Photograph 29 [P1010029 May 1, 2008] – Satellite Accumulation Area Container, which was properly labeled and stored.

Photograph 30 [P1010030 May 1, 2008] – Hazardous waste storage area. The rows were prepared with aisle space prior to my departure.

Photograph 31 [P1010031 May 1, 2008] - Hazardous waste storage area. The rows were prepared with aisle space prior to my departure.

Photograph 32 [P1010032 May 1, 2008] - Hazardous waste storage area. The rows were prepared with aisle space prior to my departure.

Clear Lam
PACKAGING, INC.
ENGINEERED PACKAGING SOLUTIONS

1950 Pratt Blvd. • Elk Grove Village, IL 60007, USA • Phone: 847-439-8570 • Fax: 847-439-8589 • www.clearlam.com

Flexible Film Extrusion, Printing and Laminating • MAP Systems • Sheet Extrusion and Thermoforming • Forming Films

FACSIMILE TRANSMITTAL

DATE: 5-6-08
COMPANY: U.S. EPA
ATTN: Jamie Paulin
FAX #: 312-353-4788
NUMBER OF PAGES: 4 (Including Cover Sheet)
FROM: Bob White

SPECIAL INSTRUCTIONS

IF YOU DON'T RECEIVE ALL PAGES OR IF THEY ARE ILLEGIBLE,
PLEASE CONTACT OUR OFFICE AT (847) 439-8570.

GENERATOR NOTIFICATION TO RECLAIMED ENERGY CO. OF LAND DISPOSAL RESTRICTIONS

Part I Generator Information

Generator: Clear Lam

Waste Stream #: 12349 EPA ID#: ILD 984 805 317

Manifest Number: 000 556 895 JJE Manifest Line #: Wastewater: _____ Non-wastewater X

Signature Statement: All of the information in this document is complete and accurate to the best of my knowledge and information

11a. X 11b. ____ 11c. ____ 11d. ____

Signature: _____ Title: _____ Date: _____

Part II Treatment Standards for Characteristic Waste

_____ D001 High TOC subcategory that are managed in Non-CWA/ Non-CWA equivalent/Non-class I SDWA systems

__K__ **D001 High TOC Ignitable characteristic liquids subcategory – greater than or equal to 10% TOC**

Waste Code	Metal	Concentration	Waste Code	Metal	Concentration
D004	Arsenic	5.0 mg/l	D008	Lead	5.0 mg/L
D005	Barium	100.0 mg/L	D009	Mercury	.20 mg/L
D006	Cadmium	1.0 mg/L	D010	Selenium	5.7 mg/L
D007	Chromium	5.0 mg/L	D011	Silver	5.0 mg/L

☐ This waste must be treated so that it meets universal treatment standards for 1) constituent that caused the waste to be identified a hazardous and 2) all other underlying hazardous constituents listed in 40 CFR 268.48.

List individual waste codes: _____

☐ This waste is hazardous only because it exhibits the following TC organic waste codes(S): _____ and must be treated to the treatment standards under 268.40 and the individual treatment standards at 268.48 for the subset of underlying hazardous constituents listed below:

List individual uhc: _____

NOTE: This notification is required by 40 CFR 268.7. It is to be attached to the manifest for the initial shipment of each hazardous waste stream to Reclaimed Energy. A copy is to be retained by the generator for three years.

Part III Treatment Standards for Listed Wastes (check codes that apply)

___ F001 ___ F002 X F003 ___ F004 X F005

Check if Applicable	Regulated Hazardous Constituent	CAS Number	Wastewaters Conc. (mg/L)	Non Wastewaters Conc. (mg/L)
X	Acetone	67-64-1	0.28	160.0
	Benzene	71-43-2	0.14	10.0
	n-Butyl Alcohol	71-36-3	5.6	2.6
	Carbon Disulfide	75-15-0	3.8	4.8 mg/L TCLP
	Carbon Tetrachloride	56-23-5	0.057	6.0
	Chlorobenzene	108-90-7	0.057	6.0
	m-Cresol	108-39-4	0.77	5.6
	o-Cresol	95-46-7	0.11	5.6
	Cyclohexanone	108-94-1	0.36	0.75 mg/L TCLP
	p-Cresol	106-44-5	0.77	5.6
	o-Dichlorobenzene	95-50-1	0.088	6.6
X	Ethyl acetate	141-78-6	0.34	33
	Ethyl benzene	100-41-4	0.057	10
	Ethyl Ether	60-29-7	0.12	160
	Isobutyl Alcohol	78-83-1	5.6	170
	Methanol	67-56-1	5.6	0.75mg/L TCLP
	Methylene Chloride	75-09-2	0.089	30
	Methyl Ethyl Ketone	78-93-3	0.28	36
X	Methyl Isobutyl Ketone	108-10-1	0.14	33
	Nitrobenzene	98-95-3	0.068	14
	Pyridine	110-86-1	0.014	16
	Tetrachloroethylene	127-18-4	0.056	6.0
	Toluene	108-88-3	0.08	10
X	1,1,1 Trichloroethane	71-55-6	0.054	6.0
	1,1,2 Trichloroethane	79-00-5	0.054	6.0
	Trichloroethylene	79-01-6	0.054	6.0
	1,1,2-trichloro 1,2,2-trifluoroethane	76-13-1	0.057	30
	Trichloromonofluoromethane	75-69-4	0.02	30
	Xylenes (total)	1330-20-7	0.32	30

Other Listed Codes: Waste Code	Subcategory Description	Treatment Standard 268.40 (check if applicable)	Or	Technology Code (if applicable, enter treatment code)

107 8305 8/30/07

CTRL NO: 9989

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	ILD984805317	1 1	(847)439-8570	000556895 JJK

5. Generator's Name and Mailing Address
CLEAR LAM PACKAGING, INC.
1950 PRATT BLVD. ELK GROVE VILL., IL 60007
Generator's Phone: (847)439-8570

Generator's Site Address (if different than mailing address)

SEP 10 2007

6. Transporter 1 Company Name
SUPERIOR TRANSPORTATION LOGISTICS LLC
U.S. EPA ID Number: INR000104224

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
RECLAIMED ENERGY CO., INC.
1500 WESTERN AVE. CONNERSVILLE, IN 47331
Facility's Phone: (765)825-7101
U.S. EPA ID Number: IND000780403

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. WASTE FLAMMABLE LIQUIDS, N.O.S. (CONTAINS PROPANOL, PROPYL ACETATE), 3,UN1993,PG II (RQ D001) DOT ERG# 128	001	TT	4300	G	D001	F003	F005
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. AR#12349
PLACARDS OFFERED SH TR# 175

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: CLEAR LAM GERARDO LOPEZ
Signature: [signature]
Month Day Year: 8 30 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Stephen D. Henry
Signature: [signature]
Month Day Year: 08 30 07

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H020			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Dan Eckerle
Signature: [signature]
Month Day Year: 08 30 07

GENERATOR | TRANSPORTER | INT'L | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Rev.	Date	Sections Affected / Description
Rev. 1	11/16/06	Document Established
Rev. 2	3/25/08	Revised and improved

Applicable Standards

The Hazard Communication Program was implemented to comply with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200.

1.0 Purpose

The purpose of this program is to protect our employees from chemical hazards at work place.

Clear Lam Packaging, Inc. accomplishes this by compiling a hazardous chemical list, by using material safety data sheets (MSDS's), by ensuring that containers are labeled, and by providing our employees with training and information about chemicals used.

2.0 Authority and Responsibility

The (Safety, Sanitation & Compliance Manager) is the program coordinator, acting as the representative of the VP of Manufacturing (Clear Lam Packaging and its divisions), who has overall responsibility for the program. The (Safety, Sanitation & Compliance Manager) will review and update the program, as necessary.

All employees can obtain further information on this written program, the hazardous communication standard, applicable MSDSs, and chemical information lists from the (Safety, Sanitation & Compliance Manager) or in the Production Office.

Under this program, our employees will be informed of the contents of the Hazardous Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.

3.0 Methods of Compliance

3.1 List of hazardous Chemicals

The Clear Lam Packaging, Inc. chemical inventory lists all chemicals used in production. Hazardous chemicals are identified using purchase orders and MSDS which should be sent by manufacturer with each first shipment of the new chemical.

Purchasing department should notify each supplier about an obligation to send MSDS prior to each shipment of hazardous material and each time when MSDS is updated with new data.

25, 26, 27

CONTROLLED

3.1.1 Hazards Initial Identification

Every time a new material is ordered the identification should be done by Purchasing. Purchasing will maintain a current List of Hazardous Chemicals. If hazardous material is identified, the MSDS shall be sent to Quality Coordinator. The Purchasing should notify Quality Coordinator and Safety, Sanitation and Compliance Manager each time new chemical is received. The List of Hazardous Chemicals should be updated by Purchasing. The List of Hazardous Chemicals should be maintained separately from the inventory list.

Our facilities do not manufacture any chemicals and, therefore, do not make any hazard determinations. We completely rely on the information supplied by manufacturer.

After the chemical inventory is complied, it serves, as a list of every chemical for which as MSDS must be maintained.

If MSDS was not received for the first time purchased material the Purchasing should notify Quality Coordinator to obtain a generic MSDS for this material and proceed as per this procedure. The vendor should be contacted again by Purchasing to obtain requested MSDS.

3.1.2 Workplace Hazard Identification

It is a responsibility of Safety, Sanitation & Compliance Manager:

- to identify all hazards for the specific work area
- create a List of physical and health hazards for this area
- Notify Quality Coordinator to obtain additional MSDS's , if any, for physical or health hazards that are created during processing
- train employee initially and each time employee will be exposed to new kind of hazard

3.2 Container Labeling

It is the responsibility of the warehouse employees to verify that all containers received

- are labeled as to the contents,
- have the appropriate hazard warning,
- list the name of the manufacturer.

Managers, Supervisors, lead personnel, and in house ink company, are responsible for ensuring that all hazardous chemicals in enclosed in-plant containers are properly labeled and updated, as necessary. Managers, Supervisors, lead personnel, and ink

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specialists, also ensure that newly purchased materials are checked for labels prior to use.
The Safety, Sanitation & Compliance Manager should verify that all secondary containers are labeled according to the label on the primary container.

Managers, Supervisors and Lead personnel should refer to the corresponding MSDS to assist employees in verifying label information.
If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container.

3.3 Material Safety Data Sheets (MSDS's)

MSDS's provide our employees with specific information on the chemicals that they use.
The Quality Coordinator maintains the MSDSs and is responsible for updating the MSDSs at our facility.

Whenever MSDS is updated, manufacturer should notify Purchasing and send in an updated MSDS. Purchasing should forward new MSDS to Quality Coordinator to replace the old copy with the new one.
Purchasing should also notify Safety, Sanitation and Compliance Manager about new hazardous chemical received to determine the training needs.

The material safety data sheets are kept at the following location in our facility:

- Employee lockers area (near the Lab)

To ensure that our MSDS's are up to date each of our suppliers of hazardous chemicals will be contacted by Purchasing once a year and requested to send us a latest version of MSDS or to confirm that previous version is valid.

3.4 Training Program

The Safety, Sanitation & Compliance Manager is responsible for the employees training program ensuring that all elements specified below are carried out. Prior to starting new job each employee should be trained on the following:

- An overview of the requirements contained in Hazardous Communication program,
- Hazardous chemicals present in their workplace operations,
- Location and availability of our written Hazard Communication Program,
- Physical and health effects of the hazardous chemicals,
- Methods of observation techniques used to determine the presence or release of hazardous chemicals in the work area,

OBSOLETE

- How to lessen or prevent exposure to hazardous chemicals through the usage of safe work practices and personal protective equipment,
- Steps the company has taken to lessen or prevent exposure to these chemicals,
- How to read labels and review MSDS's to obtain appropriate hazard information,
- Location of MSDS file and Hazardous Chemicals List

As part of the assessment of the training program, Clear Lam Packaging and its divisions ask for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

The Safety, Sanitation & Compliance Manager is responsible for new employees training at the time of their initial assignment and when new hazard is introduced to the work area.

Certificates are signed by all employees upon completion of their training and are kept by the Safety, Sanitation & Compliance Manager.

3.5 Hazards of Non-Routine Tasks

Employees performing hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.); will attend a special training session. The intent of the training is to inform employees of the hazardous chemicals to which they might be exposed and the proper precautions that must be exercised to reduce or avoid exposure.

3.6 Hazards of Un-Labeled Pipes

Clear Lam Packaging, Inc. will inform employees of the hazards of chemicals contained in unlabeled pipes in their work area by special training session.

3.7 Contractor Employers

The responsible Manager, will advise outside contractors in person of any chemicals hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition the supervisor on duty will advise the individuals of the location and availability of MSDS's. Each contractor bringing chemicals on-site must provide us with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

4.0 Documents

List of Hazardous Chemicals
MSDS's
Training record

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Clear Lam Packaging Inc.

Document No. **F-SOP 030-02** Revision: **2** Page 1 of 3

Title: **Crisis Management**

Approved by: Jeanne Skaggs Date: 9/17/07

Rev.	Date	Sections Affected / Description
Rev. 1	11/09/06	Document Established
Rev 2	9/17/07	5.7 Updated disaster recovery service provider

1.0 Applicable Standards

FPA – SAFE Primary Packaging Requirements, Section 2.0; Sub-Section 2.12
ISO 9001-2000 Clause 6.3

2.0 Purpose

This procedure describes the process and responsibilities for the recovery of core business after a disaster.

3.0 Scope

This procedure applies to overall product / facility recovery.

4.0 Authority and Responsibility

The general responsibilities associated with this policy are described in the text of this procedure. Responsibility for recovery is assigned to upper management, along with supervisors, group leaders, and employees. The Safety, Sanitation & Compliance Manager is responsible for the administration of this policy.

5.0 Activities

5.1 Core Business Processes:

The core business processes to keep functioning during a recovery process include:

Business process:	Departments affected:	Functional Within This Timeframe After A Disaster:
Order Processing	Sales / Customer Service	24 Hours
Purchase of Raw Material	Purchasing	24 Hours
Receiving of Goods	Receiving	24 Hours
Plate Making	Manufacturing	8 Hours
Mounting	Manufacturing	2-4 Weeks
Ink	Manufacturing	12 Hours
Printing	Manufacturing	2-4 Weeks
Adhesive	Manufacturing	2-4 Weeks
Lamination	Manufacturing	2-4 Weeks
Slitting	Manufacturing	2-4 Weeks
Quality Control	Manufacturing	12 Hours
Shipping	Manufacturing	2-4 Weeks
Accounting	Manufacturing	24 Hours

5.2 Disaster Threats:

We have identified the following potential disaster threats, their severity, and their probability of occurrence, as well as their risk level:

Disaster threat:	Severity:	Probability:	Risk:
Fire	Medium	Low	High

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Weather	Low	Low	Low
Terrorism	High	Low	Low

5.3 Business Impact Analysis

The level of impact a disaster has on our company, depends on the disaster type. Here is Clear Lam Packaging Inc. business impact analysis:

Disaster threat:	Human impact/rating:	Property impact/rating:	Business impact/rating:
Fire	Medium	Medium	Medium
Weather	Low	High	Medium
Terrorism	High	High	High

5.4 Emergency Plans

Please refer to the following emergency plan(s), in the event of an emergency:

Emergency Action Plan:	Safety, Maintenance, HR, & Production	Safety, Sanitation & Compliance Manager
Disaster Recovery Plan:	Safety, Maintenance, HR, & Production	Safety, Sanitation & Compliance Manager

We have posted the following emergency telephone numbers for use when telephones serve as a means of reporting emergencies:

Emergency Responder	Telephone Number
911 (Police / Fire)	911
MIS / IT	847.992.7182
Sun Chemical	773.581.2442
Rohm & Haas	847.649.3665
Graphic Engravers	630.595.0400
Map Transportation	847.787.0111

5.5 Roles and Responsibilities

To achieve our recovery goals and objectives, the following people will have the roles and responsibilities listed below:

Individual, Team, Department, or Agency	Backup Individual, Team, Department, or Agency	Role and Responsibility
President	All VP's	Leaders
VP Customer Service	Director Customer Service	Customers
Purchasing Director	Supply Stream Management	Purchasing of Raw Goods
VP Manufacturing	Shift / Department Managers	Production / Movement / Receiving / Shipping
CFO	VP Finance	Financial
VP Research & Development	Technical Director	Quality Assurance / Control

5.6 Post-Disaster Assessment

Once a disaster has occurred, we will assess the damage and determine our needs and recovery strategies.

5.7 Disaster Recovery Services

Clear Lam Packaging, Inc. and its divisions will contact our customers to identify sources they may specify. Clear Lam Packaging, Inc. and its divisions have selected the following alternative site(s), Win Pak Inc. and Clear Lam Packaging (Nanjing) Co., Ltd. in the event of a disaster.

5.8 Drills / Training

Due to the complexity of disasters and the recovery process, the Safety, Sanitation & Compliance Manager trains all employees. Drills and training will be conducted annually (minimum). After a recovery drill, the Plan Administrator evaluates the effectiveness of the plan and reviews any employee input concerning the drill.
After an actual disaster, further training may be necessary.

5.9 Security

To protect the company, property, and employees, certain security measures will be in place during disaster recovery:

5.10 Media Relations

Once briefed on the post-disaster analysis, the Safety, Sanitation & Compliance Manager will prepare a public statement. If necessary, the Safety, Sanitation & Compliance Manager will communicate with and/or escort media, as well as keep records of any information released to the media. Under no circumstances shall an employee speak to the media unless authorized.

5.11 Plan Evaluation

The Safety, Sanitation & Compliance Manager will thoroughly evaluate and, as necessary, revise our plan. This will ensure our program's effectiveness.

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Clear Lam
PACKAGING, INC.
ENGINEERED PACKAGING SOLUTIONS

1950 Pratt Blvd. • Elk Grove Village, IL 60007, USA • Phone: 847-439-8570 • Fax: 847-439-8589 • www.clearlam.com

Flexible Films Division • MAP Systems Division • Extrusion & Thermoforming Division • Forming Films Division

EMPLOYEE RECORD OF SAFETY ORIENTATION

The Training Session was conducted by:

Thomas E. Cozza (Safety, Sanitation & Compliance Manager)

The Training Session included the following Guidelines:

- Health & Safety Policy
- Loss Control Principles
- Codes of Safe Practices
- Unsafe Acts
- Unsafe Conditions
- Safe Operating Procedures
- Here's what YOU can do about Safety
- Employee Record of Safety Orientation

I understand I will be required to have safety shoes before starting work at Clear Lam Packaging, Inc.

I fully understand the Policy and this Training Session I have received a copy of the Employee Safety Guidelines

I have been advised that Record of this Safety Session will be place in my personnel file as part of my permanent record.

ANTONIO ALCARAZ
Name of Employee (please print)

Antonio Alcaraz
Signature of Employee

2-28-08
Date

WASTE LABELING & P/U PROCEDURE

1. All waste requires a "HAZARDOUS WASTE" label (provided) on each container. Waste labels are specific to stream (liquid, solid, rags) being generated. Use label with the following authorization numbers:

   #129894 for solid
   #129893 for rags
   #129017 for liquids

2. Solid and rag streams will be re-labeled during pick up. New labels will be provided by vendor which will now include the specific manifest number.

3. After p/u, the manifest needs to be brought up to Purchasing ASAP in order to fax over a copy to Chem-Tel, Inc. Chem-Tel will handle any calls if there should be an emergency during transportation. Chem-Tel's phone number is listed on all our manifests.

4. In addition, Purchasing will mail to the Illinois EPA a copy of each manifest.

5. If additional labels are needed, then contact Purchasing.

6. Once an invoice is received, slop, solids, and rags are recorded on an excel spreadsheet. A copy of all invoice paperwork is kept with the original paperwork.

7. At the end of every month, an inventory is taken for the number of drums of liquid, solid, and rags on hand. The total amount of slop pick up recorded on the excel spreadsheet is recorded as picked up slop. This is used to calculate the gallons & pounds generated by taking the prior months total gallons of slop in inventory minus the slop picked up and minus the ending inventory of slop. This number of gallons is multiplied by 8.56 to convert gallons to pounds.

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EVACUACION DE EMERGENCIA

Nombre ANTONIO ALCARAZ **Fecha** 9-20-07

1. Todas las rutas de salida tienen que estar claras todo el tiempo
   Verdadero o Falso

2. A Clear Lam Packaging se le requiere tener un plan de acción de emergencia por escrito
   Verdadero o Falso

3. Nunca participe en las pruebas de evacuación
   Verdadero o Falso

4. Exciten diferentes señales de alarma
   Verdadero o Falso

5. Rutas de salidas son solo las puertas que lo guían fuera del edificio
   Verdadero o Falso

6. Ciertos empleados se quedan atrás para cierres críticos
   Verdadero o Falso

7. Puertas que se pueden confundir con salidas se tienen que marcar con ESTA NO ES UNA SALIDA.
   Verdadero o Falso

8. Usted tiene que saber las señales de evacuación
   Verdadero o Falso

9. Las señales de salida no se tienen que ver
   Verdadero o Falso

10. Siempre tiene que saber cual es su área de reunirse
    Verdadero o Falso

Antonio Alcaraz
Firma del Empleado

Thomas E. Cozza
Firma del Entrenador

Rev.	Date	Sections Affected / Description
Rev. 1	01/01/2006	
Rev. 2	01/01/2007	

1.0 Applicable Standards

OSHA's Emergency Action Plan requirements, found at 29 CFR 1910.38(a), require **Clear Lam Packaging and its divisions** to have a written emergency plan (EPA). This plan applies to all operations in our company where employees may encounter an emergency situation.

2.0 Purpose

Clear Lam Packaging and its divisions are dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, Our Emergency Action Plan (EAP) in initiated. This EAP is in place to ensure employees safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the action and procedures to be followed in case of a workplace emergency.

3.0 Scope

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

4.0 Administrative Duties

The (Safety, Sanitation & Compliance Manager) or (designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions.
- Notifying the local fire or police departments, and the building owner/superintendent in the event of an emergency affecting the facility;
- Taking security measures to protect employees;
- Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied;
- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
- Conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan;

- Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
- Deciding which emergency response to initiate (evacuate or not);
- Ensuring that equipment is placed and locked in storage rooms or desks for protection;
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The (Safety, Sanitation & Compliance Manager), (designee's from each division) are responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from the:

Flexible Films Division
VP of Manufacturing Office
Production Office
Shift Manager's Office
Main Office
Human Resources Office
Receptionist Desk

Extrusion & Thermoforming Division
VP of Manufacturing Office
Extrusion/Thermoforming Managers Office
Main Office
Receptionist Desk

MAP Systems Division
VP of Operations Office
Shop Manager's Office
Receptionist Desk

Forming Films Division
Production Office
Main Office

The (Safety, Sanitation & Compliance Manager) or (designee) has full authority to decide to implement the EAP if he/she believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility and thus call for the implementation of this EAP:

- Fires, Hazardous Materials, Weather Related, Electrical, Etc.

The following personnel can be contacted regarding further information about duties under the written Emergency Action Plan:

Flexible Films Division

Safety, Sanitation & Compliance Manager
Shift Manager's
Maintenance Manager
VP of Finance
Human Resource Director
VP of Manufacturing
Press Manager
Maintenance Engineer
VP of Customer Service

Extrusion & Thermoforming Division

VP of Manufacturing
Thermoforming/Extrusion Manager

MAP Systems Division

VP of Operations
Shop Manager

Key Management personal home telephone numbers are kept in a safe place, for immediate use in the even of an emergency. These telephone numbers are located in the:
Flexible Films, MAP Systems, Extrusion & Thermoforming, Forming Films Divisions

Main Production Office
Safety, Sanitation & Compliance Office
Main Office
VP of Manufacturing Office
Human Resources Office
Receptionist Desk

Telephone numbers of key management personnel have been distributed to designated personnel to be retained in their homes for use in communicating an emergency occurring during non-work hours.

If, after reading this plan, you find that improvements can be made, please contact the plan administrator, (Safety, Sanitation & Compliance Manager) or (designee). We encourage all suggestions because we are committed to the success of our Emergency Action Plan. We strive for clear understanding, safe behavior, and improvement in the program from every level of the company.

5.0 Alarms

Different emergencies call for different alarms to indicate what action employees should take. Clear Lam Packaging – and its divisions has established an employee alarm system that complies with 29CFR 1910.165. Clear Lam Packaging and its divisions; use ADT in conjunction with the fire department. It has a distinctive alarm capable of identification as a signal whether or not to evacuate for each emergency, which in turn notifies the fire department and local authorities.

We realize that where alarm signals have similar sounds and used for purposes other than to signal evacuation, they can confused with the fire alarm signal and either be ignored or cause overreaction.

Therefore, we use a distinctive signal (telephone code alarm) for each purpose, including alerting fire brigade members, if applicable. Fire extinguishers are located strategically Throughout the plant (see appendix A & B) near each required exit. We will use the tornado alarm to warn employees of tornadoes.

Such as:
(Code Blue) For non-evacuation (Code Red) For Fire Evacuation
(Code Yellow) For Weather-related (Code Black) For intruders

6.0 Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe place. Our emergency procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the plan administrator's authority to determine whether employees should remain inside evacuate.

At this company, the following types of emergency evacuation may exist:

- Total and Immediate Evacuation, Partial Evacuation.

Our emergency escape procedures and assignments are designed to respond to many potential emergencies that require them, including fire, Explosions, and Hazardous release.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

- All employees should cease work.
- Forklift drivers should pull their vehicles to the side.
- All employees should report to the (Supervisor, Lead man or designated safe area) for further instructions.
- Follow all evacuation procedures.
- Don't run (walk)
- Hit emergency stop before exiting their machine.

See the appendix for a copy of the building plans with means of egress procedures for each group evacuating an area or building.

Once the evacuation alarms sounds, employees are to head toward their designated assembly or safe area, where a head count will be performed, and further instructions given.

Following is a list of assembly/safe zones for Clear Lam Packaging & its divisions:

Assembly Area Number 1 **Assembly Area Number 2**

Assembly Area Number 3 **Assembly Area Number 4**

See appendix C for diagram.

7.0 Procedures to Account for Employees

Trained evacuation personnel (Supervisor, Lead, or designees) assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation id complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternatives escapes routes from the workplace. Before leaving, these employees check rooms and other enclosed in the workplace for employees who may be trapped or otherwise unable to evacuate the area.

A list of trained personnel appears below:

Flexible Division

Shift Manager	Press Manager	Press Supervisor
Press Leads	Group Leaders	CS Manager
CS Group Leaders	Ex. Secretary	

Sheet Extrusion & Thermoforming Division:

Thermoforming/Extrusion manager's	Group Managers	Group Leaders

MAP Systems Division

Shop Manager	Group Leaders

Forming Films Division

Group Managers	Group Leaders

This list indicates a sufficient number of employees who have been designated by the company and trained to:

- Direct and assist in safe and orderly emergency evacuation.
- Provide guidance and instruction for all types of emergency situations.
- Be aware of employee with special needs, who require assistance.
- Use the buddy system and,
- Avoid hazardous areas during an emergency evacuation.

The list of trained personnel includes at least one person from every department from every shift. This means that every trained evacuation person is responsible for seeing to approximately 30 evacuated employees. The trained personnel also serve as a resource of information about emergency procedures and conduct once an evacuation is complete.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs as well as suppliers, customers, and other non-employees on the premises, when an emergency occurs, and be aware of who assent or otherwise away from the premises. Accounting for employees and non-employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary.

Shift Managers will direct all employees in an emergency situation at all times!

Each department reports to their respective representative as follows:

Flexible Films Division

Shift Manager	Group Leaders	Press Manager
Press Supervisor	Maintenance Manager	CS Manager
CS Group Leaders	Ex. Secretary	Administrative Assistant
Account Manager	Purchasing Manager	

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Manager	Group Leaders	Group Operators

MAP Systems Division

VP of Operations	Shop Manager

Once each evacuated group of employees have reached their evacuation destination, each trained evacuation employee:

- Takes roll of his or her group
- Make sure all persons are accounted for.

- Repots in to a central check point managed by the (Safety, Sanitation & Compliance Manager) and/or designee
- Assumes role of department contact answer questions.

Head count results should be giving to the Elk Grove Fire Department Chief or firefighter, if requested.

Other duties provided by the trained personnel during an emergency evacuation include the following:

- Evacuation, Communication, Head Counts, and Information.

No employees are to return to the building until advised by the (Safety, Sanitation & Compliance Manager) or designee (after determination has been made that such re-entry is safe). If anyone is injured or contaminated, the plan Administrator will activate rescue and first aid actions. If an emergency incident expands, the EAP Administrator may send employee's home by normal means or provide them with transportation to an offside location.

8.0 Non-Evacuation Emergency Procedures

Clear Lam Packaging and its divisions have the following non-evacuation procedures:

- Ceases work in affected area; go to safe areas till further notice by Plan Administrator.

Responding to a tornado alarm

In the event of a tornado, it is corporate policy to provide emergency warning and shelter. Once employees are made aware of a tornado situation, they are to follow these procedures:

- Cease work and proceed to nearest designated or safe area.

Employees should stay away from windows, but stay inside building or safe area they are in.
The following is a table with shelter assignments listed:

ASSEMBLY AREA SAFE ZONES FOR EMPLOYEES

Shipping – Receiving Office - Molding _ Plate Marking – QC – Lab – Mounting – Front Office (Assembly Area 1)

Slitting – Shipping – Roll Wrappers (Assembly Area 2)

Press – Ink – Adhesive - Warehouse (Assembly Area 3)

Laminating – Maintenance (Assembly Area 4)

SEE SUPERVISOR OR LEADMAN FROM YOUR DEPARTMENT FOR FUTHER INSTRUTIONS!

Employees are not to leave the shelter or return to their regular duties until the all clear is given.

The (Safety, Sanitation & Compliance Manager) or (designee) will determine when it is safe for employees to leave their tornado shelter to work. At that time, the plan Administrator will administer code letter.

If there is structural damage, the plan Administrator or (designee) will call Emergency Fire & Police.

If anyone is injured or contaminated, the plan Administrator will activate rescue and first aid actions and/or designee.

9.0 Critical Operations

Clear Lam Packaging and its divisions have critical operations that cannot be shut down for emergencies. These operations include the following:

Electrical panels Ink room or solvent room doors Computers

The employees who are designated to remain behind during evacuation to care for critical plant operations include the following:

Flexible Films Division

Shift Manager Press Manager Press Supervisor Press Lead
Group Leaders CS Manger CS Group leaders Ex. Secretary

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

The procedures to be taken by those employees who have been selected to remain behind to care for essential plant operations until their evacuation becomes absolutely necessary include the following:

- Shutting down all electrical panels
- Close all ink/solvent/storage room doors
- Shutting down machines, etc

10.0 Plan Administrator Duties

During an emergency, The (Safety, Sanitation & Compliance Manager) or (designee) will do the following:

- Setup check points
- Call fire department or rescue

11.0 Rescue and First-Aid

Rescue and first aid may be necessary during emergency situations. Circumstances calling for rescue and/or first aid include:

Circumstances:	**ERT Procedures:**
➢ Fires	Gather fire extinguisher (call fire department)
➢ Hazardous Materials	Gather all employees and go to nearest safe or exit area.
➢ Weather Related	Go to designated safe area.

Emergency Response Team (ERT) members are responsible for performing rescue duties in case of an emergency requiring rescue. Members of the ERP include:

Flexible Films Division

Shift Managers Press Manager Press Supervisors
Press Leads Group Leaders CS Manager
CS Group Leaders Ex. Secretary

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

12.0 Training

Our Plan Administrator reviews with each of our employees at the following times, those parts of the Emergency Action Plan that employees must know to protect them in the event of an emergency:

- Initially when the plan is developed
- Whenever a new employee is hired
- Whenever an employee's responsibilities or designated actions under the plan changes
- Whenever new equipment, material, or processes are introduced into the workplace
- Whenever the layout or design or the facility changes
- Whenever the plan is changed

The training includes the following

- Where escape routes are
- Nearest exits
- Head Count

The information in this plan is not intended for casual reading, but is intended to get the appropriate message across. We present the material for training in the following manner:

- Lecture. Video, Power Point Presentation, Discussions, etc

We communicate the contents of this plan through a presentation followed by a drill.

Clear Lam Packaging and its divisions perform drills for the following emergencies:

- Fires, Hazardous materials, etc
- We hold these drills at least every 6 months

After a drill, the Plan Administrator judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedures or was ineffective. For example, they may discover doors that would not open; they may enter storage closet instead of exiting; they may get lost and confused or they may carry a suspicious package through the facility. These are the types of things the Plan Administrator needs to hear about after a drill. That way, they can be addressed before a real emergency.

13.0 Emergency Equipment and Support

Our company provides the following equipment and support for use by our trained personnel during emergencies:

- Escape routes
- Fire extinguisher
- Nearest exits

14.0 Appendices

We have attached to this Emergency Action Plan, the following documents for reference to ensure a better understanding of our written program:

- Diagram of building zones
- Fire Extinguisher Locations
- Exits (stating you are here)
- Code alarms
- Building locations

Employees designated to remain behind to operate critical plant operations during an emergency include the following

Flexible Films Division

Shift Managers
Press Leads
CS Group Leaders
Press Manager
Group Leaders
Ex. Secretary
Press Supervisors
CS Manager

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

The types of emergency action plans we have at this facility include the following
Fire, Hazardous materials, Weather related, etc.

Land and Chemicals Division

Type of Document: **Inspection Report w/ Checklist**

Facility Name:	Clear Lam Packaging, Inc.
Facility Location:	1950 Pratt Boulevard
Facility City:	Elk Grove Village
Facility State:	Illinois
Facility ZIP Code:	60007
U.S. EPA ID Number:	ILD 984 805 317

Assigned Staff			
Jamie L. Paulin	**(LCD/RCRA)**	Phone:	**6-1771**
	(ORC)	Phone:	

Name	Signature		Date
Author	Jamie L. Paulin	X Jamie L. Paulin	6/6/08
Section Chief Initial Review	Mary S. Sierocin	X Mary S. Sierocin	6/6/08
ORC Attorney		X	
ORC Section Chief		X NA	
Section Chief		X	
Branch Chief	**Willie H. Harris**	X	
Division Director	**Margaret M. Guerriero**	X NA	
Regional Administrator		X NA	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief/Division Director/Regional Administrator signs this sheet and original letter:

Date stamp the cover letter;

Make three copies of the contents of this folder:

a. One copy for the assigned staff;
b. One copy for the section file; and
c. One copy for the official file.

Make any additional copies for cc's or bcc's

cc's:

bcc's:

Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;

E-mail staff the date that the letter was received by facility.

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Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0028 Expires 10-30-91
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

Installation's EPA ID Number: ILD984865317

Approved | Date Received (yr mo day)

I. Name of Installation

CLEAR LAM PACKAGING INC

II. Installation Mailing Address

Street or P.O. Box: 1950 PRATT BLVD

City or Town: ELK GROVE VILLAGE | State: IL | ZIP Code: 60007

III. Location of Installation

Street or Route Number: SAME

City or Town: | State: | ZIP Code:

IV. Installation Contact

Name and Title *(last, first, and job title)*: URRY ROBERT VP MFG

Phone Number *(area code and number)*: 7084398570

V. Ownership

A. Name of Installation's Legal Owner: MERLE LAHTI

B. Type of Ownership *(enter code)*: P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On-site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED
SEP 28 1990
IEPA-DLPC

SEP 14 1990
U.S. EPA, REGION V
SWB — PMS

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only - enter 'X' in the appropriate box(es))*

- [ ] A. Air
- [ ] B. Rail
- [X] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [X] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: [illegible]

EPA Form 8700-12 (Rev. 10-88) Previous edition is obsolete

Continue on reverse

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ID - For Official Use Only

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 5				
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number 40 CFR Part 261.33 for each chemical substance your installation handles which may be hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 - 261.24)*

☒ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
[signature]	ROBERT J. URRY V.P. MFG.	8-22-90

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

FORM GM

CLEAR LAM PACKAGING, INC.
2007

VENDOR	PICK-UP DATE	PO NUMBER	SLOP QUANTITY PICK-UP	SOLIDS QUANTITY PICK-UP	RAGS/DRUMS QUANTITY PICK-UP	TOTAL
HYDRITE CHEMICAL	01/04/07	15936	5,300			
HYDRITE CHEMICAL	01/11/07	15937		935	18	
HYDRITE CHEMICAL	01/18/07	16077	5,000			
						11,235
HYDRITE CHEMICAL	02/07/07	16234	5,300			
HYDRITE CHEMICAL	02/15/07	16354		880	16	
CLEAN HARBORS	02/21/07	16359	5,300			
						11,480
HYDRITE CHEMICAL	03/15/07	16579		660	19	
HYDRITE CHEMICAL	03/16/07	16578	5,490			
						6,150
HYDRITE CHEMICAL	04/04/07	16767	5,398			
HYDRITE CHEMICAL	04/25/07	16902	5,490			
HYDRITE CHEMICAL	04/26/07	16902		880	16	
						11,768
HYDRITE CHEMICAL	05/16/07	17106	5,661			
						5,661
HYDRITE CHEMICAL	06/06/07	17286	4,781			
HYDRITE CHEMICAL	06/20/07	17391	5,490			
HYDRITE CHEMICAL	06/27/07	17474		660	25	
						10,931
HYDRITE CHEMICAL	07/05/07	17565	5,200			
HYDRITE CHEMICAL	07/25/07	17746	5,681			
HYDRITE CHEMICAL	07/26/07	17747		935	18	
						11,816
HYDRITE CHEMICAL	08/03/07	17855	4,500			
HYDRITE CHEMICAL	08/08/07	17856		605	4	
HYDRITE CHEMICAL	08/24/07	18061	4,900			
SUPERIOR SOLVENT- NO CHARGE	08/30/07	18093	4,425			
						14,430
HYDRITE CHEMICAL	09/10/07	18155	4,781			
HYDRITE CHEMICAL	09/11/07	18168		880	11	
HYDRITE CHEMICAL	09/18/07	18238		770	8	
HYDRITE CHEMICAL	09/25/07	18284	4,700			
						11,131
HYDRITE CHEMICAL	10/02/07	18362		605	11	
HYDRITE CHEMICAL	10/10/07	18407	5,600			
HYDRITE CHEMICAL	10/24/07	18524		1045	11	
						7,250
HYDRITE CHEMICAL	11/01/07	18600	5,600			
HYDRITE CHEMICAL	11/13/07	18759		935	14	
HYDRITE CHEMICAL	11/14/07	18743	5,500			
HYDRITE CHEMICAL	11/27/07	18848		715	5	
HYDRITE CHEMICAL	11/28/07	18870	5,000			
						17,750
HYDRITE CHEMICAL	12/12/07	19010	5,300			
HYDRITE CHEMICAL	12/19/07	19054		1375	14	
						6,675
			114,397	**11,880**	**190**	126,277
					*55 GALLONS	126,277
					10,450	**0**

FORM GM

CLEAR LAM PACKAGING, INC.
2008

VENDOR	PICK-UP DATE	PO NUMBER	SLOP QUANTITY PICK-UP	SOLIDS QUANTITY PICK-UP	RAGS/DRUMS QUANTITY PICK-UP	TOTAL		
HYDRITE CHEMICAL	01/02/08	19134	5,047				gc	GREENCASTLE
HYDRITE CHEMICAL	01/23/08	19287	5,102				gc	GREENCASTLE
HYDRITE CHEMICAL	01/22/08	19233		1155	13		pc	POLUTION CONTROL INDUSTRIES
						11,304		
HYDRITE CHEMICAL	02/11/08	19489	5,500				gc	GREENCASTLE
HYDRITE CHEMICAL	02/20/08	19584	4,870				gc	GREENCASTLE
HYDRITE CHEMICAL	02/27/08	19586		1155	10		pc	POLUTION CONTROL INDUSTRIES
						11,525		
HYDRITE CHEMICAL	03/13/08	19729	1,100				reclaimed	HYDRITE COMEICAL CO
HYDRITE CHEMICAL	03/20/08	19785		1045	14		pc	POLUTION CONTROL INDUSTRIES
						2,145		
HYDRITE CHEMICAL	04/01/08	19902	5,400				gc	GREENCASTLE
HYDRITE CHEMICAL	04/02/08	19913		660	6		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	04/11/08	20024	4,890				gc	GREENCASTLE
HYDRITE CHEMICAL	04/29/08	20185		1705			pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	04/30/08	20186	5,200				gc	GREENCASTLE
						17,855		
HYDRITE CHEMICAL	05/06/08	20228		550	13		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	05/12/08	20255	5,100				gc	GREENCASTLE
HYDRITE CHEMICAL	05/23/08	20402		880	12		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	05/28/08	20436	4,800				gc	GREENCASTLE
						11,330		
HYDRITE CHEMICAL	06/18/08	20616		660	10		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	06/19/08	20591	5,100				gc	GREENCASTLE
						5,760		
HYDRITE CHEMICAL	07/01/08	20725	4,323				gc	GREENCASTLE
HYDRITE CHEMICAL	07/15/08	20858		935	7		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	07/16/08	20880			21		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	07/17/08	20859	3,841				gc	GREENCASTLE
HYDRITE CHEMICAL	07/24/08	20945		385	7		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	07/29/08	20976		660			pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	07/30/08	20964	4,323				gc	GREENCASTLE
						14,467		
HYDRITE CHEMICAL	08/05/08	21011			13		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	08/12/08	21071		660	6		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	08/15/08	21151		385	9		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	08/26/08	21253	4,669				gc	GREENCASTLE
HYDRITE CHEMICAL	08/27/08	21187		715			pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	08/28/08	21283		330	13		pc	POLUTION CONTROL INDUSTRIES
						6,759		
HYDRITE CHEMICAL	09/11/08	21393	4,555				gc	GREENCASTLE
HYDRITE CHEMICAL	09/16/08	21361		440	11		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	09/23/08	21467		495	10		pc	POLUTION CONTROL INDUSTRIES
						5,490	gc	
at this point any add'l will be 10/01								
HYDRITE CHEMICAL	10/01/08	21561		330	11		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	10/01/08	21560	4,200				gc	GREENCASTLE
HYDRITE CHEMICAL	10/08/08	21615		385	8		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	10/14/08	21712		330	11		pc	POLUTION CONTROL INDUSTRIES
						5,245		
HYDRITE CHEMICAL	11/01/08	21803	4,890				gc	GREENCASTLE
HYDRITE CHEMICAL	11/01/08	21791		220	13		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	11/05/08	21932	4,084				gc	GREENCASTLE
HYDRITE CHEMICAL	11/05/08	21886		440	10		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	11/11/08	21956		660	4		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	11/14/08	22018					pc	POLUTION CONTROL INDUSTRIES
						10,294		
HYDRITE CHEMICAL	12/01/08	22097	5,661				gc	GREENCASTLE
HYDRITE CHEMICAL	12/01/08	22099		220	12		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	12/01/08	21680	3,700				gc	GREENCASTLE
HYDRITE CHEMICAL	12/10/08	22176		275	11		pc	POLUTION CONTROL INDUSTRIES
HYDRITE CHEMICAL	12/16/08	22257		385	13			
						10,241		
			96,355	**16,060**	**268**	**112,415**		
					*55 GALLONS	112,415		
					14,740	**0**		

Name	Title	Phone No	Email
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James B. Hirst	VP of Manufacturing CLP	847 343-0894	jhirst@clearlam.com
Thomas Woloff	V.P. - Finance	CLP	847-439-8570	twoloff@clearlam.com
THOMAS E COZZA	SSC MANAGER	CLP	847-439-8570	tcozza@clearlam.com

Rev.	Date	Sections Affected / Description
Rev. 1	11/16/06	Document Established
Rev. 2	3/25/08	Revised and improved

Applicable Standards

The Hazard Communication Program was implemented to comply with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200.

1.0 Purpose

The purpose of this program is to protect our employees from chemical hazards at work place.

Clear Lam Packaging, Inc. accomplishes this by compiling a hazardous chemical list, by using material safety data sheets (MSDS's), by ensuring that containers are labeled, and by providing our employees with training and information about chemicals used.

2.0 Authority and Responsibility

The (Safety, Sanitation & Compliance Manager) is the program coordinator, acting as the representative of the VP of Manufacturing (Clear Lam Packaging and its divisions), who has overall responsibility for the program. The (Safety, Sanitation & Compliance Manager) will review and update the program, as necessary.

All employees can obtain further information on this written program, the hazardous communication standard, applicable MSDSs, and chemical information lists from the (Safety, Sanitation & Compliance Manager) or in the Production Office.

Under this program, our employees will be informed of the contents of the Hazardous Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.

3.0 Methods of Compliance

3.1 List of hazardous Chemicals

The Clear Lam Packaging, Inc. chemical inventory lists all chemicals used in production. Hazardous chemicals are identified using purchase orders and MSDS which should be sent by manufacturer with each first shipment of the new chemical.

Purchasing department should notify each supplier about an obligation to send MSDS prior to each shipment of hazardous material and each time when MSDS is updated with new data.

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3.1.1 Hazards Initial Identification

Every time a new material is ordered the identification should be done by Purchasing. Purchasing will maintain a current List of Hazardous Chemicals. If hazardous material is identified, the MSDS shall be sent to Quality Coordinator. The Purchasing should notify Quality Coordinator and Safety, Sanitation and Compliance Manager each time new chemical is received. The List of Hazardous Chemicals should be updated by Purchasing. The List of Hazardous Chemicals should be maintained separately from the inventory list.

Our facilities do not manufacture any chemicals and, therefore, do not make any hazard determinations. We completely rely on the information supplied by manufacturer.

After the chemical inventory is complied, it serves, as a list of every chemical for which as MSDS must be maintained.

If MSDS was not received for the first time purchased material the Purchasing should notify Quality Coordinator to obtain a generic MSDS for this material and proceed as per this procedure. The vendor should be contacted again by Purchasing to obtain requested MSDS.

3.1.2 Workplace Hazard Identification

It is a responsibility of Safety, Sanitation & Compliance Manager:

- to identify all hazards for the specific work area
- create a List of physical and health hazards for this area
- Notify Quality Coordinator to obtain additional MSDS's , if any, for physical or health hazards that are created during processing
- train employee initially and each time employee will be exposed to new kind of hazard

3.2 Container Labeling

It is the responsibility of the warehouse employees to verify that all containers received

- are labeled as to the contents,
- have the appropriate hazard warning,
- list the name of the manufacturer.

Managers, Supervisors, lead personnel, and in house ink company, are responsible for ensuring that all hazardous chemicals in enclosed in-plant containers are properly labeled and updated, as necessary. Managers, Supervisors, lead personnel, and ink

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specialists, also ensure that newly purchased materials are checked for labels prior to use.
The Safety, Sanitation & Compliance Manager should verify that all secondary containers are labeled according to the label on the primary container.

Managers, Supervisors and Lead personnel should refer to the corresponding MSDS to assist employees in verifying label information.
If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container.

3.3 Material Safety Data Sheets (MSDS's)

MSDS's provide our employees with specific information on the chemicals that they use.
The Quality Coordinator maintains the MSDSs and is responsible for updating the MSDSs at our facility.

Whenever MSDS is updated, manufacturer should notify Purchasing and send in an updated MSDS. Purchasing should forward new MSDS to Quality Coordinator to replace the old copy with the new one.
Purchasing should also notify Safety, Sanitation and Compliance Manager about new hazardous chemical received to determine the training needs.

The material safety data sheets are kept at the following location in our facility:

- Employee lockers area (near the Lab)

To ensure that our MSDS's are up to date each of our suppliers of hazardous chemicals will be contacted by Purchasing once a year and requested to send us a latest version of MSDS or to confirm that previous version is valid.

3.4 Training Program

The Safety, Sanitation & Compliance Manager is responsible for the employees training program ensuring that all elements specified below are carried out. Prior to starting new job each employee should be trained on the following:

- An overview of the requirements contained in Hazardous Communication program,
- Hazardous chemicals present in their workplace operations,
- Location and availability of our written Hazard Communication Program,
- Physical and health effects of the hazardous chemicals,
- Methods of observation techniques used to determine the presence or release of hazardous chemicals in the work area,

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- How to lessen or prevent exposure to hazardous chemicals through the usage of safe work practices and personal protective equipment,
- Steps the company has taken to lessen or prevent exposure to these chemicals,
- How to read labels and review MSDS's to obtain appropriate hazard information,
- Location of MSDS file and Hazardous Chemicals List

As part of the assessment of the training program, Clear Lam Packaging and its divisions ask for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

The Safety, Sanitation & Compliance Manager is responsible for new employees training at the time of their initial assignment and when new hazard is introduced to the work area.

Certificates are signed by all employees upon completion of their training and are kept by the Safety, Sanitation & Compliance Manager.

3.5 Hazards of Non-Routine Tasks

Employees performing hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.); will attend a special training session. The intent of the training is to inform employees of the hazardous chemicals to which they might be exposed and the proper precautions that must be exercised to reduce or avoid exposure.

3.6 Hazards of Un-Labeled Pipes

Clear Lam Packaging, Inc. will inform employees of the hazards of chemicals contained in unlabeled pipes in their work area by special training session.

3.7 Contractor Employers

The responsible Manager, will advise outside contractors in person of any chemicals hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition the supervisor on duty will advise the individuals of the location and availability of MSDS's. Each contractor bringing chemicals on-site must provide us with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

4.0 Documents

List of Hazardous Chemicals
MSDS's
Training record

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Clear Lam Packaging Inc.

Document No. **F-SOP 030-02** Revision: **2** Page 1 of 3

Title: **Crisis Management**

Approved by: Jeanne Skaggs Date: 9/17/07

Rev.	Date	Sections Affected / Description
Rev. 1	11/09/06	Document Established
Rev 2	9/17/07	5.7 Updated disaster recovery service provider

1.0 Applicable Standards

FPA – SAFE Primary Packaging Requirements, Section 2.0; Sub-Section 2.12
ISO 9001-2000 Clause 6.3

2.0 Purpose

This procedure describes the process and responsibilities for the recovery of core business after a disaster.

3.0 Scope

This procedure applies to overall product / facility recovery.

4.0 Authority and Responsibility

The general responsibilities associated with this policy are described in the text of this procedure. Responsibility for recovery is assigned to upper management, along with supervisors, group leaders, and employees. The Safety, Sanitation & Compliance Manager is responsible for the administration of this policy.

5.0 Activities

5.1 Core Business Processes:

The core business processes to keep functioning during a recovery process include:

Business process:	Departments affected:	Functional Within This Timeframe After A Disaster:
Order Processing	Sales / Customer Service	24 Hours
Purchase of Raw Material	Purchasing	24 Hours
Receiving of Goods	Receiving	24 Hours
Plate Making	Manufacturing	8 Hours
Mounting	Manufacturing	2-4 Weeks
Ink	Manufacturing	12 Hours
Printing	Manufacturing	2-4 Weeks
Adhesive	Manufacturing	2-4 Weeks
Lamination	Manufacturing	2-4 Weeks
Slitting	Manufacturing	2-4 Weeks
Quality Control	Manufacturing	12 Hours
Shipping	Manufacturing	2-4 Weeks
Accounting	Manufacturing	24 Hours

5.2 Disaster Threats:

We have identified the following potential disaster threats, their severity, and their probability of occurrence, as well as their risk level:

Disaster threat:	Severity:	Probability:	Risk:
Fire	Medium	Low	High

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Weather	Low	Low	Low
Terrorism	High	Low	Low

5.3 Business Impact Analysis

The level of impact a disaster has on our company, depends on the disaster type. Here is Clear Lam Packaging Inc. business impact analysis:

Disaster threat:	Human impact/rating:	Property impact/rating:	Business impact/rating:
Fire	Medium	Medium	Medium
Weather	Low	High	Medium
Terrorism	High	High	High

5.4 Emergency Plans

Please refer to the following emergency plan(s), in the event of an emergency:

Emergency Action Plan:	Safety, Maintenance, HR, & Production	Safety, Sanitation & Compliance Manager
Disaster Recovery Plan:	Safety, Maintenance, HR, & Production	Safety, Sanitation & Compliance Manager

We have posted the following emergency telephone numbers for use when telephones serve as a means of reporting emergencies:

Emergency Responder	Telephone Number
911 (Police / Fire)	911
MIS / IT	847.992.7182
Sun Chemical	773.581.2442
Rohm & Haas	847.649.3665
Graphic Engravers	630.595.0400
Map Transportation	847.787.0111

5.5 Roles and Responsibilities

To achieve our recovery goals and objectives, the following people will have the roles and responsibilities listed below:

Individual, Team, Department, or Agency	Backup Individual, Team, Department, or Agency	Role and Responsibility
President	All VP's	Leaders
VP Customer Service	Director Customer Service	Customers
Purchasing Director	Supply Stream Management	Purchasing of Raw Goods
VP Manufacturing	Shift / Department Managers	Production / Movement / Receiving / Shipping
CFO	VP Finance	Financial
VP Research & Development	Technical Director	Quality Assurance / Control

5.6 Post-Disaster Assessment

Once a disaster has occurred, we will assess the damage and determine our needs and recovery strategies.

5.7 Disaster Recovery Services

Clear Lam Packaging, Inc. and its divisions will contact our customers to identify sources they may specify. Clear Lam Packaging, Inc. and its divisions have selected the following alternative site(s), Win Pak Inc. and Clear Lam Packaging (Nanjing) Co., Ltd. in the event of a disaster.

5.8 Drills / Training

Due to the complexity of disasters and the recovery process, the Safety, Sanitation & Compliance Manager trains all employees. Drills and training will be conducted annually (minimum). After a recovery drill, the Plan Administrator evaluates the effectiveness of the plan and reviews any employee input concerning the drill.
After an actual disaster, further training may be necessary.

5.9 Security

To protect the company, property, and employees, certain security measures will be in place during disaster recovery:

5.10 Media Relations

Once briefed on the post-disaster analysis, the Safety, Sanitation & Compliance Manager will prepare a public statement. If necessary, the Safety, Sanitation & Compliance Manager will communicate with and/or escort media, as well as keep records of any information released to the media. Under no circumstances shall an employee speak to the media unless authorized.

5.11 Plan Evaluation

The Safety, Sanitation & Compliance Manager will thoroughly evaluate and, as necessary, revise our plan. This will ensure our program's effectiveness.

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Clear Lam Packaging, Inc.

Document No. **29 CFR 1910.38(a)** Revision: **1**

Title: **Emergency Action Plan (EAP)**

Approved by: Thomas E Cogan Date: 01/01/2006

Rev.	Date	Sections Affected / Description
Rev. 1	01/01/2006	
Rev. 2	01/01/2007	

1.0 Applicable Standards

OSHA's Emergency Action Plan requirements, found at 29 CFR 1910.38(a), require **Clear Lam Packaging and its divisions** to have a written emergency plan (EPA). This plan applies to all operations in our company where employees may encounter an emergency situation.

2.0 Purpose

Clear Lam Packaging and its divisions are dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, Our Emergency Action Plan (EAP) in initiated. This EAP is in place to ensure employees safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the action and procedures to be followed in case of a workplace emergency.

3.0 Scope

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

4.0 Administrative Duties

The (Safety, Sanitation & Compliance Manager) or (designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions.
- Notifying the local fire or police departments, and the building owner/superintendent in the event of an emergency affecting the facility;
- Taking security measures to protect employees;
- Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied;
- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
- Conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan;

- Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
- Deciding which emergency response to initiate (evacuate or not);
- Ensuring that equipment is placed and locked in storage rooms or desks for protection;
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The (Safety, Sanitation & Compliance Manager), (designee's from each division) are responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from the:

Flexible Films Division
VP of Manufacturing Office
Production Office
Shift Manager's Office
Main Office
Human Resources Office
Receptionist Desk

Extrusion & Thermoforming Division
VP of Manufacturing Office
Extrusion/Thermoforming Managers Office
Main Office
Receptionist Desk

MAP Systems Division
VP of Operations Office
Shop Manager's Office
Receptionist Desk

Forming Films Division
Production Office
Main Office

The (Safety, Sanitation & Compliance Manager) or (designee) has full authority to decide to implement the EAP if he/she believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility and thus call for the implementation of this EAP:

- Fires, Hazardous Materials, Weather Related, Electrical, Etc.

The following personnel can be contacted regarding further information about duties under the written Emergency Action Plan:

Flexible Films Division

Safety, Sanitation & Compliance Manager
Shift Manager's
Maintenance Manager
VP of Finance
Human Resource Director
VP of Manufacturing
Press Manager
Maintenance Engineer
VP of Customer Service

Extrusion & Thermoforming Division

VP of Manufacturing
Thermoforming/Extrusion Manager

MAP Systems Division

VP of Operations
Shop Manager

Key Management personal home telephone numbers are kept in a safe place, for immediate use in the even of an emergency. These telephone numbers are located in the:
Flexible Films, MAP Systems, Extrusion & Thermoforming, Forming Films Divisions

Main Production Office
Safety, Sanitation & Compliance Office
Main Office
VP of Manufacturing Office
Human Resources Office
Receptionist Desk

Telephone numbers of key management personnel have been distributed to designated personnel to be retained in their homes for use in communicating an emergency occurring during non-work hours.

If, after reading this plan, you find that improvements can be made, please contact the plan administrator, (Safety, Sanitation & Compliance Manager) or (designee). We encourage all suggestions because we are committed to the success of our Emergency Action Plan. We strive for clear understanding, safe behavior, and improvement in the program from every level of the company.

5.0 Alarms

Different emergencies call for different alarms to indicate what action employees should take. Clear Lam Packaging – and its divisions has established an employee alarm system that complies with 29CFR 1910.165. Clear Lam Packaging and its divisions; use ADT in conjunction with the fire department. It has a distinctive alarm capable of identification as a signal whether or not to evacuate for each emergency, which in turn notifies the fire department and local authorities.

We realize that where alarm signals have similar sounds and used for purposes other than to signal evacuation, they can confused with the fire alarm signal and either be ignored or cause overreaction.

Therefore, we use a distinctive signal (telephone code alarm) for each purpose, including alerting fire brigade members, if applicable. Fire extinguishers are located strategically Throughout the plant (see appendix A & B) near each required exit. We will use the tornado alarm to warn employees of tornadoes.

Such as:

(Code Blue) For non-evacuation (Code Red) For Fire Evacuation
(Code Yellow) For Weather-related (Code Black) For intruders

6.0 Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe place. Our emergency procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the plan administrator's authority to determine whether employees should remain inside evacuate.

At this company, the following types of emergency evacuation may exist:

- Total and Immediate Evacuation, Partial Evacuation.

Our emergency escape procedures and assignments are designed to respond to many potential emergencies that require them, including fire, Explosions, and Hazardous release.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

- All employees should cease work.
- Forklift drivers should pull their vehicles to the side.
- All employees should report to the (Supervisor, Lead man or designated safe area) for further instructions.
- Follow all evacuation procedures.
- Don't run (walk)
- Hit emergency stop before exiting their machine.

See the appendix for a copy of the building plans with means of egress procedures for each group evacuating an area or building.

Once the evacuation alarms sounds, employees are to head toward their designated assembly or safe area, where a head count will be performed, and further instructions given.

Following is a list of assembly/safe zones for Clear Lam Packaging & its divisions:

Assembly Area Number 1 **Assembly Area Number 2**

Assembly Area Number 3 **Assembly Area Number 4**

See appendix C for diagram.

7.0 Procedures to Account for Employees

Trained evacuation personnel (Supervisor, Lead, or designees) assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation id complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternatives escapes routes from the workplace. Before leaving, these employees check rooms and other enclosed in the workplace for employees who may be trapped or otherwise unable to evacuate the area.

A list of trained personnel appears below:

Flexible Division

Shift Manager	Press Manager	Press Supervisor
Press Leads	Group Leaders	CS Manager
CS Group Leaders	Ex. Secretary	

Sheet Extrusion & Thermoforming Division:

Thermoforming/Extrusion manager's	Group Managers	Group Leaders

MAP Systems Division

Shop Manager	Group Leaders

Forming Films Division

Group Managers	Group Leaders

This list indicates a sufficient number of employees who have been designated by the company and trained to:

- Direct and assist in safe and orderly emergency evacuation.
- Provide guidance and instruction for all types of emergency situations.
- Be aware of employee with special needs, who require assistance.
- Use the buddy system and,
- Avoid hazardous areas during an emergency evacuation.

The list of trained personnel includes at least one person from every department from every shift. This means that every trained evacuation person is responsible for seeing to approximately 30 evacuated employees. The trained personnel also serve as a resource of information about emergency procedures and conduct once an evacuation is complete.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs as well as suppliers, customers, and other non-employees on the premises, when an emergency occurs, and be aware of who assent or otherwise away from the premises. Accounting for employees and non-employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary.

Shift Managers will direct all employees in an emergency situation at all times!

Each department reports to their respective representative as follows:

Flexible Films Division

Shift Manager	Group Leaders	Press Manager
Press Supervisor	Maintenance Manager	CS Manager
CS Group Leaders	Ex. Secretary	Administrative Assistant
Account Manager	Purchasing Manager	

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Manager	Group Leaders	Group Operators

MAP Systems Division

VP of Operations	Shop Manager

Once each evacuated group of employees have reached their evacuation destination, each trained evacuation employee:

- Takes roll of his or her group
- Make sure all persons are accounted for.

- Repots in to a central check point managed by the (Safety, Sanitation & Compliance Manager) and/or designee
- Assumes role of department contact answer questions.

Head count results should be giving to the Elk Grove Fire Department Chief or firefighter, if requested.

Other duties provided by the trained personnel during an emergency evacuation include the following:

- Evacuation, Communication, Head Counts, and Information.

No employees are to return to the building until advised by the (Safety, Sanitation & Compliance Manager) or designee (after determination has been made that such re-entry is safe). If anyone is injured or contaminated, the plan Administrator will activate rescue and first aid actions. If an emergency incident expands, the EAP Administrator may send employee's home by normal means or provide them with transportation to an offside location.

8.0 Non-Evacuation Emergency Procedures

Clear Lam Packaging and its divisions have the following non-evacuation procedures:

- Ceases work in affected area; go to safe areas till further notice by Plan Administrator.

Responding to a tornado alarm

In the event of a tornado, it is corporate policy to provide emergency warning and shelter. Once employees are made aware of a tornado situation, they are to follow these procedures:

- Cease work and proceed to nearest designated or safe area.

Employees should stay away from windows, but stay inside building or safe area they are in.
The following is a table with shelter assignments listed:

ASSEMBLY AREA SAFE ZONES FOR EMPLOYEES

Shipping – Receiving Office - Molding _ Plate Marking – QC – Lab – Mounting – Front Office (Assembly Area 1)

Slitting – Shipping – Roll Wrappers (Assembly Area 2)

Press – Ink – Adhesive - Warehouse (Assembly Area 3)

Laminating – Maintenance (Assembly Area 4)

SEE SUPERVISOR OR LEADMAN FROM YOUR DEPARTMENT FOR FUTHER INSTRUTIONS!

Employees are not to leave the shelter or return to their regular duties until the all clear is given.

The (Safety, Sanitation & Compliance Manager) or (designee) will determine when it is safe for employees to leave their tornado shelter to work. At that time, the plan Administrator will administer code letter.

If there is structural damage, the plan Administrator or (designee) will call Emergency Fire & Police.

If anyone is injured or contaminated, the plan Administrator will activate rescue and first aid actions and/or designee.

9.0 Critical Operations

Clear Lam Packaging and its divisions have critical operations that cannot be shut down for emergencies. These operations include the following:

Electrical panels Ink room or solvent room doors Computers

The employees who are designated to remain behind during evacuation to care for critical plant operations include the following:

Flexible Films Division

Shift Manager Press Manager Press Supervisor Press Lead
Group Leaders CS Manger CS Group leaders Ex. Secretary

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

The procedures to be taken by those employees who have been selected to remain behind to care for essential plant operations until their evacuation becomes absolutely necessary include the following:

- Shutting down all electrical panels
- Close all ink/solvent/storage room doors
- Shutting down machines, etc

10.0 Plan Administrator Duties

During an emergency, The (Safety, Sanitation & Compliance Manager) or (designee) will do the following:

- Setup check points
- Call fire department or rescue

11.0 Rescue and First-Aid

Rescue and first aid may be necessary during emergency situations. Circumstances calling for rescue and/or first aid include:

Circumstances:	**ERT Procedures:**
➢ Fires	Gather fire extinguisher (call fire department)
➢ Hazardous Materials	Gather all employees and go to nearest safe or exit area.
➢ Weather Related	Go to designated safe area.

Emergency Response Team (ERT) members are responsible for performing rescue duties in case of an emergency requiring rescue. Members of the ERP include:

Flexible Films Division

Shift Managers Press Manager Press Supervisors
Press Leads Group Leaders CS Manager
CS Group Leaders Ex. Secretary

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

12.0 Training

Our Plan Administrator reviews with each of our employees at the following times, those parts of the Emergency Action Plan that employees must know to protect them in the event of an emergency:

- Initially when the plan is developed
- Whenever a new employee is hired
- Whenever an employee's responsibilities or designated actions under the plan changes
- Whenever new equipment, material, or processes are introduced into the workplace
- Whenever the layout or design or the facility changes
- Whenever the plan is changed

The training includes the following

- Where escape routes are
- Nearest exits
- Head Count

The information in this plan is not intended for casual reading, but is intended to get the appropriate message across. We present the material for training in the following manner:

- Lecture. Video, Power Point Presentation, Discussions, etc

We communicate the contents of this plan through a presentation followed by a drill.

Clear Lam Packaging and its divisions perform drills for the following emergencies:

- Fires, Hazardous materials, etc
- We hold these drills at least every 6 months

After a drill, the Plan Administrator judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedures or was ineffective. For example, they may discover doors that would not open; they may enter storage closet instead of exiting; they may get lost and confused or they may carry a suspicious package through the facility. These are the types of things the Plan Administrator needs to hear about after a drill. That way, they can be addressed before a real emergency.

13.0 Emergency Equipment and Support

Our company provides the following equipment and support for use by our trained personnel during emergencies:

- Escape routes
- Fire extinguisher
- Nearest exits

14.0 Appendices

We have attached to this Emergency Action Plan, the following documents for reference to ensure a better understanding of our written program:

- Diagram of building zones
- Fire Extinguisher Locations
- Exits (stating you are here)
- Code alarms
- Building locations

Employees designated to remain behind to operate critical plant operations during an emergency include the following

Flexible Films Division

Shift Managers
Press Leads
CS Group Leaders
Press Manager
Group Leaders
Ex. Secretary
Press Supervisors
CS Manager

Sheet Extrusion & Thermoforming Division

Thermoforming/Extrusion Managers Group Managers Group Leaders

MAP Systems Division

Shop Manager Group Leads

Forming Films Division

Group Managers Group Leads

The types of emergency action plans we have at this facility include the following
Fire, Hazardous materials, Weather related, etc.

Clear Lam
PACKAGING, INC.
ENGINEERED PACKAGING SOLUTIONS

1950 Pratt Blvd. • Elk Grove Village, IL 60007, USA • Phone: 847-439-8570 • Fax: 847-439-8589 • www.clearlam.com

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EMPLOYEE RECORD OF SAFETY ORIENTATION

The Training Session was conducted by:

Thomas E. Cozza (Safety, Sanitation & Compliance Manager)

The Training Session included the following Guidelines:

- Health & Safety Policy
- Loss Control Principles
- Codes of Safe Practices
- Unsafe Acts
- Unsafe Conditions
- Safe Operating Procedures
- Here's what YOU can do about Safety
- Employee Record of Safety Orientation

I understand I will be required to have safety shoes before starting work at Clear Lam Packaging, Inc.

I fully understand the Policy and this Training Session I have received a copy of the Employee Safety Guidelines

I have been advised that Record of this Safety Session will be place in my personnel file as part of my permanent record.

ANTONIO ALCARAZ
Name of Employee (please print)

Antonio Alcaraz
Signature of Employee

2-28-08
Date

WASTE LABELING & P/U PROCEDURE

1. All waste requires a "HAZARDOUS WASTE" label (provided) on each container. Waste labels are specific to stream (liquid, solid, rags) being generated. Use label with the following authorization numbers:

   #129894 for solid
   #129893 for rags
   #129017 for liquids

2. Solid and rag streams will be re-labeled during pick up. New labels will be provided by vendor which will now include the specific manifest number.

3. After p/u, the manifest needs to be brought up to Purchasing ASAP in order to fax over a copy to Chem-Tel, Inc. Chem-Tel will handle any calls if there should be an emergency during transportation. Chem-Tel's phone number is listed on all our manifests.

4. In addition, Purchasing will mail to the Illinois EPA a copy of each manifest.

5. If additional labels are needed, then contact Purchasing.

6. Once an invoice is received, slop, solids, and rags are recorded on an excel spreadsheet. A copy of all invoice paperwork is kept with the original paperwork.

7. At the end of every month, an inventory is taken for the number of drums of liquid, solid, and rags on hand. The total amount of slop pick up recorded on the excel spreadsheet is recorded as picked up slop. This is used to calculate the gallons & pounds generated by taking the prior months total gallons of slop in inventory minus the slop picked up and minus the ending inventory of slop. This number of gallons is multiplied by 8.56 to convert gallons to pounds.

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EVACUACION DE EMERGENCIA

Nombre ANTONIO ALCARAZ **Fecha** 9-20-07

1. Todas las rutas de salida tienen que estar claras todo el tiempo
   Verdadero o Falso

2. A Clear Lam Packaging se le requiere tener un plan de acción de emergencia por escrito
   Verdadero o Falso

3. Nunca participe en las pruebas de evacuación
   Verdadero o Falso

4. Exciten diferentes señales de alarma
   Verdadero o Falso

5. Rutas de salidas son solo las puertas que lo guían fuera del edificio
   Verdadero o Falso

6. Ciertos empleados se quedan atrás para cierres críticos
   Verdadero o Falso

7. Puertas que se pueden confundir con salidas se tienen que marcar con ESTA NO ES UNA SALIDA.
   Verdadero o Falso

8. Usted tiene que saber las señales de evacuación
   Verdadero o Falso

9. Las señales de salida no se tienen que ver
   Verdadero o Falso

10. Siempre tiene que saber cual es su área de reunirse
    Verdadero o Falso

Antonio Alcaraz
Firma del Empleado

Thomas E. Cozza
Firma del Entrenador